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United States
Department of
Agriculture

Forest Service

Cody, Wyoming

FINAL ENVIRONMENTAL IMPACT STATEMENT

SHOSHONE NATIONAL FOREST

Volume II

Chapter VI

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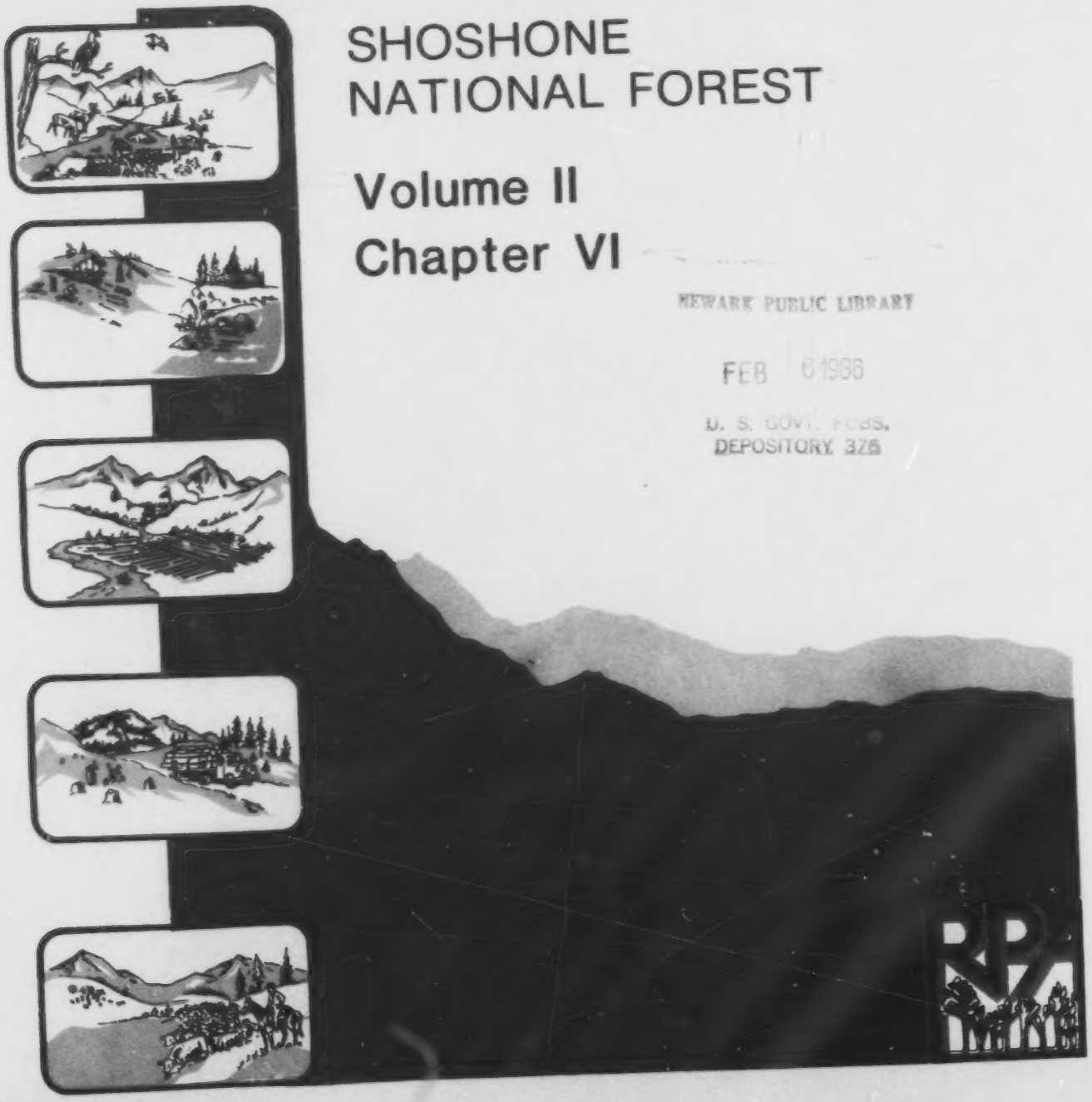

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Shoshone National Forest
Land and Resource Management Plan
Final Environmental Impact Statement

Volume II

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VI. CONSULTATION WITH OTHERS AND MAILING LIST

CHAPTER VI

CONSULTATION

OVERVIEW

This chapter discusses efforts to involve and consult with the public in preparation of the Forest Plan and EIS. It also displays the comments received during the formal public comment period on the proposed Plan and draft EIS, as well as the Forest Service response to each. Organization of this chapter is as follows:

- discussion of the role of consultation and public involvement;
- presentation of consultation and public involvement activities which occurred prior to publication of the Draft EIS and Proposed Plan;
- presentation of consultation and public involvement activities which occurred following publication of the Draft EIS and Proposed Plan;
- general discussion and synopsis of the comments received relating to the published Draft EIS and Proposed Plan including a listing of respondents in the order in which comments were received and a listing of respondents alphabetically according to affiliation.
- presentation of all public comments in the order received, along with specific Forest Service responses to each; and
- listing of all agencies, organizations, businesses, and individuals to whom copies of the final EIS and Plan are sent.

Role of Consultation and Public Involvement

Throughout the planning process it was evident that there are different understandings and expectations about the value of public input and how it would be used in the decision making process. The following discussion is an attempt to clarify the role of public involvement in forest planning.

Forest Service decisions are based on five major factors: laws, technical information, resource capability, professional judgement, and public participation. Public participation enters into the decision-making process when there is room for interpretation in any of the first four factors, especially when there is a choice of management or use emphasis in a given area.

Use of public comment is not merely a vote counting process. The responsible official must consider each comment in light of the decision factors, opposing comments, and environmental concerns.

A primary purpose of consulting with other agencies is to ensure their management plans and land use policies are considered during the Forest planning process.

CONSULTATION

CONSULTATION BEFORE ISSUANCE OF THE DRAFT EIS AND PROPOSED FOREST PLAN

Consultation and public participation associated with the Forest Plan began on November 14, 1980 with publication in the Federal Register of the Notice of Intent to prepare a Forest Plan and EIS. Amended Notices of Intent were published on August 25, 1983 and December 17, 1984. Consultation during the Forest planning effort prior to issuance of the draft documents included both formal and informal contacts with numerous local, state, and federal agencies including:

- Wyoming Game and Fish Department
- Fish and Wildlife Service
- Bureau of Land Management
- National Park Service
- Wyoming Department of Environmental Quality, Water Quality Division
- Wyoming Office of the State Engineer
- Bureau of Indian Affairs, Wind River Reservation
- Environmental Protection Agency
- Park County Planning Commission

Included in the above contacts were informal meetings with personnel from Yellostone National Park regarding their planning effort and future direction for management of the Park. This management and cooperative efforts provided input to management planning for developed recreation along access corridors through the Forest to the Park, planning of grizzly bear habitat management, management planning and standards for management of wilderness recreation adjoining the Park including commercial outfitters and guides, and management of transportation networks important to both the Park and the Forest.

Other consultation with agencies included such activities as:

- involving personnel from the Wyoming Game and Fish Department in data and inventory efforts for planning wildlife habitat management;

- briefing personnel in that Department on preliminary results of alternatives in terms of ability to meet wildlife population targets established by that agency and working out a procedure for reconciling conflicts;

- informal consultation during plan development with the Fish and Wildlife Service in regard to management of habitat for threatened and endangered species;

- formal and informal meetings with the Bureau of Land Management (BLM) regarding management of the minerals resources on the Forest, the overall planning process, and preliminary discussions regarding planning of adjoining areas of land administered by both agencies;

- consultation with personnel in the BLM regarding results of social impact analyses done separately by both agencies pertaining to the same set of public issues;

- informal and formal discussions with the Wyoming Highway Department regarding their plans as they pertain to management of the transportation network on the Forest;

- and informal meetings with County planners regarding the planning process being used, and implications of plans and alternatives.

In addition to the above, the Chambers of Commerce of Cody, Lander and Dubois, Wyoming were contacted. The Wyoming congressional delegation was appraised on a continuing basis of progress in the planning effort. Information was shared during development of wilderness legislation including preliminary analysis results. Input was gathered in conjunction with other National Forest matters that have required the delegation's attention.

Consultation and public participation efforts associated with other planning projects such as oil and gas leasing in the Washakie Wilderness, nonwilderness geophysical investigations, and the oil and gas well proposal on the North Fork of the Shoshone River have contributed additional insights to the Forest planning effort. Results of these consultation efforts are documented in the Draft EIS for Oil and Gas Exploration and Leasing in the Washakie Wilderness, the Environmental Assessment for Geophysical Investigations ... of the Shoshone National Forest and the Draft EIS Northfork Well. Significant public participation efforts associated with these efforts include:

- In May 1981, an information pamphlet titled Oil and Gas Leasing Proposals Within the Washakie Wilderness was published and about 1000 copies distributed.

- On June 30, July 1 and 2, 1981, open houses were held in Cody, Casper and Dubois, Wyoming to exchange information regarding possible oil and gas leasing within the Washakie Wilderness.

- In January 1982, public meetings were held in Cody, Casper and Dubois to discuss the draft EIS regarding oil and gas exploration and leasing within the Washakie Wilderness.

- On March 21, 1984, a public meeting was held in Cody to answer questions concerning the draft EIS for the North Fork well. There were about 140 people in attendence. Issues and concerns expressed assisted in refining and validating issues and concerns addressed in Forest planning.

From the initiation of Forest Planning on the Forest, many informal and formal contacts were made with local people and representatives of local, regional, and national interest groups. The Planning Action I document, Identification of Issues, Concerns and Opportunities, contains information regarding public participation and consultation. Appendix A summarizes the issues, concerns, and opportunities and describes the process used to define the planning problem statements. Informal contacts with local people dealing with planning and other facets of management were on-going from 1980 to the present time. These contacts involved many personnel on the Forest as they performed day-to-day activities and were passed on for consideration in planning. Such information was communicated both formally in the form of notes to the interdisciplinary

team, and informally during staff and management team meetings. Formal public participation activities include:

- On October 27, 1983 a public meeting to initiate the scoping process regarding roadless area re-evaluation was held in Casper, Wyoming. Even though this issue was resolved through passage of the Wyoming Wilderness Act of 1984, the meeting did contribute to refining other Forest planning issues.

- In March through May 1984, six meetings were held to provide information to the public regarding how planning was being done; to share preliminary results of planning; to gather information regarding public issues; and to involve the public in a process to estimate the social impacts of alternatives formulated for the draft EIS. Three meetings were held in Cody, two in Dubois, and one in Lander, Wyoming.

- From October to December 1984, an information room was established in the Forest Supervisor's office to display information regarding Forest planning and to assist in defining and refining issues with interested publics.

- On October 26, 1984, a Forest planning newsletter was distributed to interested individuals, organizations and agencies informing them of the status of the planning effort and asking for input to the process.

Representatives of the Forest have appeared on local radio and television programs to discuss planning and have spoken to many civic organizations. In addition, briefings for local media have been held and periodic articles have been published in local newspapers discussing Forest Planning. A series of meetings were held in the spring of 1984 to discuss Forest Planning and to distribute a planning information pamphlet. At these meetings, interested publics were invited to participate. Also, Forest personnel have discussed planning on a one-to-one basis with interested individuals.

A Forest planning newsletter was sent to interested individuals, organizations and agencies on October 26, 1984 to inform them of the status of the Forest Plan, outlining what had been done, what was being done, what was left to do, preliminary analysis results, and to solicit public input. In that newsletter, the public was invited to come to the Supervisor's office to view planning materials including FORPLAN prescriptions, yield tables, and economic values used in planning. Further, when individuals or groups came to inspect materials on display, they were asked for more information regarding their concerns about management of the Forest. About 60 individuals participated in review of materials and provided input to planning in this way. Included in this group were representatives of the League of Women Voters, Sierra Club, Greater Yellowstone Coalition, Louisiana-Pacific Corporation, the Wyoming Game and Fish Department, and the BLM.

A number of organizations had direct input to the development of the planning process and/or the development and analysis of alternatives. Included in this set of contacts were:

- a briefing of officials from Louisiana-Pacific Corporation regarding how timber analysis was being done and input on the types of logging technology they could foresee being used on the Forest. This input was incorporated in FORPLAN prescriptions and economics tables.

- a series of meetings with the Rocky Mountain Oil and Gas Association (RMOGA). This included reviewing a procedure for incorporating oil and gas concerns in analysis developed by RMOGA. This procedure was modified and results were discussed with RMOGA as documented in Appendix D. Further, their input provided additional materials that were included in this document.

- a series of meetings with representatives of the Sierra Club and Greater Yellowstone Coalition to review results of benchmark analysis and the FORPLAN prescriptions included in the final FORPLAN model. This led to input from this group which was used to help formulate alternative C. This input and how it was used are presented in Appendix B of this document.

All contacts with other agencies, organizations and the general public had a significant impact on the FORPLAN prescriptions included in analysis, the formulation of alternatives, the evaluation of alternatives, and the identification of the preferred alternative.

CONSULTATION BETWEEN DRAFT EIS/PROPOSED PLAN AND FINAL EIS/FOREST PLAN

The proposed Plan and draft EIS were mailed or otherwise distributed beginning June 28, 1985. The public comment period started on July 5, 1985 upon formal filing with the Council on Environmental Quality and publishing of a Notice of Availability in the Federal Register. The comment period closed on October 3, 1985. During this period, a number of meetings were held in regard to the planning documents and 185 written comments were received.

Public meetings and other forms of consultation are summarized below.

- A news conference was held on July 2 to announce the availability of the proposed Plan and draft EIS.

- Meetings sponsored by the Forest Service were held in Powell, Cody, Meeteetse, Dubois, Thermopolis, and Lander, Wyoming between July 15 and August 2 to provide the public with an overview of the planning process and to provide guidance on how to read the documents. Each District Ranger invited members of the public to attend an open house for discussing specifics of the Plan. Open houses were held subsequent to the meeting in each town where a Ranger District Office is located.

- Between August 19 to September 6, several meetings were held by environmental interest groups. The Sierra Club and Greater Yellowstone Coalition sponsored three meetings in various locations. The Forest Service was invited to and attended two of the meetings.

- On September 7 a field trip was held for the benefit of the Wyoming Wildlife Federation and Greater Yellowstone Coalition on the Wind River Ranger District to review timber practices and to discuss other aspects of the Proposed Plan.

- Discussions were held with representatives of various oil companies at the Cody Supervisor's Office. They were provided with information related to leasing and lease analysis procedures.

- Discussions were held with representatives of the timber industry from Dubois and Lander and Forest Service personnel from the Bridger-Teton National Forest.

- Representatives of Cascade Holistic Economic Consultants (CHEC) visited the Supervisor's Office and spent a week reviewing analysis documentation and other Forest records.

- District Rangers met with local Chambers of Commerce.

- A number of interviews were provided the local and regional press.

- Coordination occurred between the Forest and various wildlife interests, notably Wyoming Game and Fish and Fish and Wildlife Service.

SUMMARY OF PUBLIC COMMENTS

Comments about the proposed Plan or draft EIS fell into the following categories:

- Comments offering technical advice or pointing out inconsistencies have been evaluated and adopted where appropriate.

- Comments resulting from a misunderstanding of what was stated or intended in the draft documents provided guides for clarification in the finals.

- Comments requesting additional analysis or data displays were evaluated and responded to as shown in the written responses to specific comments. In many instances the analysis and display was beyond the practical scope of the documents, or the requested data is unavailable. Some reanalysis was conducted in response to such comments.

- Comments disagreeing with methods, conclusions, or decisions were reviewed and where appropriate, changes were made in the Plan and EIS.

Changes engendered by public comment and other sources are discussed in a section entitled SUMMARY OF CHANGES BETWEEN DRAFT AND FINAL EIS in Chapter I of the Final EIS and Forest Plan. This discussion covers, in general, all changes in the document. Similar discussions appropriate for each chapter are found in the overview for that chapter.

Comments expressing a preference or opinion may be the most important to an individual but the most difficult to respond to by changing the documents. In some cases, preferences relating to management direction standards and guidelines were viable and changes were appropriate. However, comments relating to the application of a prescription emphasis were much more difficult to deal with for the following reasons.

- First, a suggested change may be beyond Forest Service jurisdiction or legal bounds. For example, the Forest Service cannot establish or remove wilderness designation, nor can it provide wilderness "buffer zones".

- Second, a suggested change may be beyond the scope of the EIS. For example, the specific and local environmental consequences of oil and gas development in an area that has yet to be leased cannot be dealt with in this document. The procedure for lease analysis and recommendation can be established in the Plan, reserving effects analysis and disclosure for future, site-specific environmental analysis.

- Third, any suggested change must be considered in the light of other, often conflicting, comments on the same subject. A number of written comments expressed the idea that all Forest Service lands should be free of oil and gas leases, while others felt all nonwilderness lands should be available for leasing with surface occupancy. Forest Service discretionary powers lie somewhere between these two views, with limited but significant room to move one way or the other along the continuum.

Comments were received from individuals, organizations, businesses, State and Federal Agencies, and State Representatives. The number and proportion of letters in each category are:

Type of Commenter	Number of Letters	Percentage of Total
Individuals	112	60
Businesses	35	19
Organizations	27	15
Agencies	8	4
Congressional	3	2

In total, 185 comment letters were received. Most of these letters commented on multiple points with some letters many pages in length. All letters are reproduced in the same form in which they were received. Major points in each letter have been responded to. These letters and responses comprise most of this Chapter. There are five major areas of comment contained in the of letters. These are:

- oil and gas leasing and operations;
- relation of the Forest to the greater Yellowstone area;
- timber and roads as related to recreation and wildlife;
- disposition of roadless areas; and
- management of the Clarks Fork River.

The next section presents a synopsis of the comments and a general response to each major area.

Synopsis of Comments and Forest Service Response

Oil and Gas Resources

Synopsis of Comment. The oil and gas industry felt that 1) the Proposed Plan was biased against oil and gas exploration and developement in that restrictions on activities were beyond that which is appropriate or provided for by law; 2) the decision to recommend lease denial in Grizzly Bear Situation I is inappropriate if not illegal; 3) too much weight was given in the planning process to local groups who oppose oil and gas activities; 4) trade-off analysis was not executed in earnest; and 5) analysis of opportunity costs of existing wilderness should have been carried out.

Another group of respondents felt that oil and gas and other minerals activities should be greatly reduced or eliminated.

Response. The intent of the Forest Plan is to provide opportunities for oil and gas exploration and development wherever legally possible with controls on operations designed to make these activities compatible with other resource objectives. Resource coordination requirements affect all resource management programs, not just minerals activities. All activities are managed so as not to violate the standards and requirements of the other resources. The Forest Service cannot rely on a perceived willingness by operators or contractors to meet various requirements. All requirements must be a part of the "contractual package", be it a permit to drill or a timber sale contract or whatever. The process described in the Errata to Appendix K of the Proposed Plan (which has been incorporated into Appendix K of the Forest Plan) describes the process by which requirements for specific leases or operations will be determined. This process includes site-specific environmental analysis and documentation.

The Multiple Use-Sustained Yield Act states:

> " ... nothing herein shall be construed as to affect the use or administration of the mineral resources of National Forest Lands ...".

The Minerals Leasing Act states:

> " ... 5. The Chief of the Forest Service must issue regulations or impose stipulations that include (a) requirements for restoration revegetation or curtailment of erosion of the surface of the land; (b) requirements to ensure that activities in connection with the rights-of-way or permits will not violate applicable air and water quality standards nor related facility siting standards established by or pursuant to law; (c) requirements designed to control or prevent damage to the environment, including damage to fish and wildlife habitat, damage to private or public property, hazards to public health or safety; and (d) requirements to protect the interests of individuals living in the general area of the right-of-way or permit who rely on the fish, wildlife, and biotic resources of the area for subsistence purposes. The regulations must apply to every right-of-way or permit granted under this section and may apply retroactively. 30 U.S.C. 185(h)(2)".

And further:

> " ... 10. Section 185 does not amend, repeal, modify, or change the requirements for an environmental impact statement or any other provision in NEPA (p. 147). Id.(h)(I)".

The point of citing the above references is to demonstrate that the management of surface resources and subsurface resources fall under many laws. It is not appropriate to cite a single law and determine that an action is illegal or discriminatory without reviewing the full array of laws that apply to the situation.

Area available for leasing in all alternatives is 934,990 acres or 38 percent of the Forest. With one exception, this represents the maximum acreage legally available considering the areas withdrawn such as wilderness, research natural areas, and administrative sites. The exception is the majority of Grizzly Bear Situation I lands outside wilderness. The decision to recommend lease denial in Situation I is supported by two previous environmental analysis documents. In both cases, there were no public comments on these documents which opposed this decision. Further, the decision was support by the U.S. Fish and Wildlife Service in their formal opinions written for these documents. The U.S. Fish and Wildlife Service recently issued a "no jeopardy opinion" on the Forest Plan (See Appendix H of the Forest Plan). This opinion was partially based on lease denial on Situation I lands.

Within the land classified as available for leasing, there are areas designed by the Plan for no-surface-occupancy (NSO). The oil and gas industry views these areas as effectively closed to leasing due to the cost of air access. The areas of NSO are the estimate of those lands which are highly susceptible to long-term impacts from oil and gas development in terms of soil and water resources. The environmental analysis process described in Forest Plan Appendix K will be used to refine NSO based on site-specific data so as to minimize "lost opportunity to discover". This represents an appropriate use of restrictions on operations based on protection of surface resources. Commenters could take exception to Forest Service data, data interpretation,

and prediction of effects. There were no comments questioning Forest Service data or its use.

Recognizing the importance of oil and gas development as a local, regional and national concern; executive orders dealing with energy self-sufficiency; and considering the laws governing mineral leasing; all acres which could be made available for leasing were made available in all alternatives. In this way, the national importance of oil and gas was explicity included. Further, a procedure for including oil and gas considerations offered by the Rocky Mountain Oil and Gas Association (RMOGA) suggests withdrawl of some areas from oil and gas operations as a way to deal with trade-offs. This strategy was rejected by the Forest. It was felt that because of legal mandates and because of the benefits of oil and gas activities, that the Forest should allow leasing and development wherever possible on the Forest and search for ways to make such operations compatible with management of other resources (per the intent of each alternative).

Because acres available did not change by alternative and yet the intent of each alternative was different, there was a need to treat oil and gas operations differently by alternative. This was needed to bring such operations into compliance with the intent of each alterantive as well as provide a basis for estimating and displaying trade-offs between oil and gas operations and other resources. The mechanism chosen for this was by varying the stipulations and operating standards that will probably be recommended for such operations. All alternatives meet legal minimums in terms of protecting soil and water resources as discussed in the EIS. However, alternatives vary in terms of stipulations and operating standards related to visuals, wildlife, and recreation. Estimates of these effects on other resources were included in analysis as displayed and discussed in Chapters II and IV of the EIS. Further, the increased cost of oil and gas operations due to stipulations and operating standards were represented by decreases in lease bid values as depicted in PNV displays in Appendix D. In this way, a full range of alternatives in terms of how those 934,990 acres would be leased is represented in Plan alternatives. Using information developed and presented in Chapters II and IV as well as Appendix D to the EIS, trade-offs were displayed and used in selection of the preferred alternative.

Given these factors, it is clear that oil and gas resources were directly included in tradeoff analysis and in development of alternatives. They were very definitely included and not "after the fact". Further, the process used complied with process requirements of the National Environmental Policy Act and public pressure was not used as a substitute for meeting such requirements.

In regard to analysis of the tradeoff between wilderness and oil and gas development (as well as timber and other development-oriented actions), NEPA and its implementing regulations do provide for analysis of alternatives which violate existing law as stated by the commenters. This is generally in application of a general law to a specific area where the benefits and costs of that application have not been considered by decision makers. This is not the case in terms of designated wilderness areas. Each area designated as wilderness was done so on an area-by-area basis by Congress. They determined, for those areas being designated as wilderness, that there was sufficient information upon which to base a decision and that decision was to designate those areas as parts of the National Wilderness System. This is evidenced by

the fact that in cases where they felt there was insufficient information on which to base their decisions, they would designate such areas as "study areas" for which they requested further analysis and information. Two such areas are designated on the Forest, the Dunoir Special Management Unit and the Beartooth High Lakes Study Area. During scoping for Forest Planning nationally, regionally, and locally, it did not appear appropriate to second guess Congress on their intent. Therefore, it was decided that such analysis was inappropriate unless requested by Congress. Such a request has not been received. Because of these reasons, analysis of opportunity costs of existing wilderness areas was not done.

Some comments raised questions concerning withdrawals from mineral entry. The General Mining Laws guide what can or cannot be withdrawn from minerals entry and under what conditions. We direct your attention specifically to Plan, Chapter III in the blue pages under Mining Law Compliance and Administration (General Direction 1C and 2) and Minerals Management Oil and Gas and Geothermal (General Direction 1). All direction found under Minerals Management, supplemented by Plan Appendix K, is intended to protect existing and proposed uses of the land for other resources thereby avoiding the need for withdrawal. If exceptional situations arise, or existing direction is shown to be insufficient, the option of withdrawal remains.

Minerals operations are, by law, a viable use of public land. Our charter, provided by Congressional action, is to manage first according to law, and not strictly according to variable market pressures. The mining laws stipulate that lease applications can be made and must be considered for lands not withdrawn. The Forest Plan alternative was selected in large part because it allows mineral activities while recognizing and maintaining the aesthetic value of clean water, stable wildlife populations, and recreation opportunities which are of primary importance to many Forest users. Appendix K of the Forest Plan affords adequate protection of popular recreation areas, critical wildlife habitat, and other such resource values through application of stipulations and recommended operating procedures. Protection may be in the form of seasonal restrictions or "no-surface-occupancy" stipulations.

Greater Yellowstone Area

Synopsis of Comment. Many respondents expressed the concern that adequate consideration be given to the role of Shoshone National Forest in the greater Yellowstone area. Concerns were related specifically to impacts, preservation, cumulative effects, and coordination.

Response. Components of the "greater Yellowstone ecosystem" (such a system has not been defined) include the habits and habitat of the grizzly bear, migratory patterns of other wildife such as deer and elk, and vegetation systems such as grassland/sagebrush ecosystems and timber ecosystems. Data collection, formulation of alternatives and analysis of alternatives including selection of the preferred alternative explicitly included consideration of maintaining the viability of all of these systems. This is a requirement in the regulations governing preparation of Forest Plan. This is portrayed throughout both the EIS and Plan. For example, provisions for recovery of the grizzly bear as dictated by the interagency committee for recovery were incorporated directly; protection of crucial preferred winter range for deer, elk, moose, and bighorn

sheep were included in all alternatives with most including activities designed to improve habitat; and Appendix F to the Plan includes direct consideration of the role of fire in the plant ecosystems of the Forest and fire prescriptions are written to allow fire to play its vital role. In this way, the viability, protection and enhancement of the natural ecosystems that are found in the greater Yellowstone area are directly included in the Plan.

The Shoshone provides access to the east and northeast entrances to Yellowstone National Park (Park). The Forest provides camping facilities as well as lodges and resorts which are used by visitors to the Park and the Forest. The vast majority of Forest land along the border of the Park is wilderness. The major species of wildlife that use both the Park and the Forest during the year are elk and grizzly bears. Major areas for consideration, then, are transportation, camping facilities, resorts and lodges, wilderness use, elk, and grizzly bears.

Consideration of Park needs for access and developed recreation sites were gathered early in the planning process and used throughout to guide development of alternatives. This included considerations for developed recreation sites built into demand projections used in planning. Preservation of wilderness and management of wilderness use were identified in the scoping process, were identified as a Planning Problem, and have been specifically considered throughout the planning process.

Management of the elk populations that migrate between the Park and the Forest is the responsibility of the Wyoming Game and Fish Department. The Forest has involved this Agency directly in data collection, mapping, and evaluation of alternatives throughout the planning process. As a threatened species, management of the Grizzly Bear is the responsibility of the U.S. Fish and Wildlife Service. Coordination efforts for the bear in the greater Yellowstone area are done through this agency and the Interagency Grizzly Bear Committee.

Management of Forest uses that are of joint concern to the Park and Forest are guided by joint committees which draft policies for these uses. One example is the effort which produced the Outfitter Guide Policy for the Greater Yellowstone Area. This is done so that activities on adjoining Forests and Parks are coordinated and consistent. These considerations have been included in all alternatives. Coordination activities specific to the Plan include:

- creation and adoption of the Guidelines for Management Involving Grizzly Bears in the Greater Yellowstone Area in 1979. The Forest took the leadership role in the development of these guidelines. Development included coordination of all National Forests in this area as well as both National Parks. As adopted in the Forest Plan, these guidelines have been incorporated in Forest Direction and require special standards for such actions as timber harvest, road management, and oil and gas leasing and operations.

- scoping for the Plan in 1980 which requested concerns of the Park.

- actions necessary for providing winter range for elk that migrate from the Park were included in development of planning criteria, data collection and mapping, analysis of production capabilities, and formulation and analysis of all alternatives. This began in 1980 with direct involvement of the Wyoming Game and Fish Department in all phases

of planning and continues today. Major areas of input include mapping of crucial preferred winter ranges (CPWR), setting habitat capability targets for each herd unit, and establishing dates for closures of these areas to motorized vehicles and oil and gas operations.

- participation in semi-annual meetings of the Greater Yellowstone Coordination Committee involving all Forests and both National Parks (Yellowstone and Grand Teton). Forest Planning and Plans are always an agenda item at these meetings in order to facilitate coordination. Further, coordination of plans and Forest planning was an all-day agenda item at the meeting of this group in the Spring of 1985.

- participation in a coordination meeting in May of 1982 discussing such items as the management of the Beartooth Highway; a road jointly managed by the Forest and Park which provides access to the northeast entrance to the Park. During that meeting the Forest Planner briefed the Park Planner on planning and planning processes being used on the Forest.

- participation in semi-annual meetings of the technical subcommitte for interagency coordination of the grizzly bear. Forest Plans and how they effect the bear are included in these meetings. Any policy revisions stemming from these meetings are incorporated in the Forest Plan.

- providing a copy of the Proposed Plan and DEIS to the Park at the same time they were mailed to all others on the mailing list for review and comment.

There are other coordination activities that occur between the Park and the Forest as well as between the Forest and other agencies where joint decisions may effect management of the Park. These are not directly oriented to development of the Forest Plan, but because they directly affect management of the Forest, the results from these activities are incorporated in planning and in the Plan. Such activities include:

- frequent meetings regarding the management of the Beartooth Highway which is maintained by the Park though it is part of the Forest road system and is on the Forest. For example, there were several meetings and discussions regarding this road and its management during 1984 and 1985 in conjunction with a lawsuit regarding the Clarks Fork Snowmobile Trail.

- meetings regarding developed recreation needs on the Forest in response to changes in Park management. For example, Park Service personnel visited the Forest in August of 1985 to inventory sites for campgrounds to possibly replace facilities that may be closed at Fishing Bridge in the Park.

- informing the Park of environmental analyses that may have a bearing on their management and inviting comment throughout the analysis procedure from scoping to review of draft documents. This includes environmental analysis of mineral activities such as:

    - the DEIS for Oil and Gas Exploration and Leasing within the Washakie Wilderness starting in May of 1981 to April of 1982,

- the EIS's for an APD along the North Fork of the Shoshone from 1983 through 1985,

- an EA dealing with seismic operations on the Forest beginning in late 1983 and continuing through 1985, and

- an analysis of oil and gas lease proposals along the South Fork of the Shoshone River being done currently.

- participation in activities relating to the reconstruction of the highway accessing the east entrance to the Park planned by the State Highway Department beginning in the Spring of 1984.

- participation in interagency committees dealing with outfitters and guides, wilderness management policies and recovery of the grizzly bear. Often, the Forest has taken a leadership role in these activities.

- sponsoring wilderness management workshops annually on the Forest where coordinated management policies are presented.

- taking the lead in developing policies regarding management of back-country and wilderness areas to reduce human-grizzly bear conflicts. This led to the development of an EA published in June 1985 which is guiding current management and has been incorporated in Forest Direction in the Plan.

- participation in a cooperative law enforcement effort during hunting season aimed at reducing grizzly bear mortalities and reducing conflicts between hunters and the bear.

- providing information in response to concerns and questions from Park personnel regarding minerals-related activities such as letters to Ken Czarnowski, Resource Manager, and Wayne Hamilton, research geologist, for the Park.

- placing a stream monitoring station on a stream that runs from the Forest into the Park.

Beyond these activities, the Forest has provided a great deal of information to a public interest group (the Greater Yellowstone Coalition) regarding a full range of activities from planned timber sales, leasing, oil and gas development, planned roads, and management of recreation and wildlife. This included involving this group directly in Forest Planning throughout the spring and fall of 1984, participating in meetings sponsored by them over the last two years, and hosting a field trip for memebers of this group in September 1985. This group provides a service of informing all who are interested in management of the the greater Yellowstone area of activities of all agencies.

Timber Harvest, Roads, Recreation, and Wildlife

Synopsis of Comment. Some respondents felt that harvest levels should be raised to improve viability of existing mills and to help with insect and disease problems. Many respondents felt that harvest levels and road

construction should be lowered because of below-cost sales or impacts on wildlife and recreation. These respondents felt that the economic timber harvest level would drop if an erroneous modeling assumption was changed. Respondents were under the impression that the timber economics analysis assumed that harvesting of timber caused benefits to wildlife and recreation.

Response. The Forest Service recognizes the insect and disease problems on certain areas of the Forest and agrees that timber harvest can be helpful in treatment of such problems. These is also recognition of the problems in viability being experienced by certain mills in Lander and Dubois. The Forest will re-examine harvest levels in relation to insects and diseases and mill viability following approval of the Forest Plan. This will be done when information becomes available on how the Proposed Plan for the Bridger-Teton National Forest addresses harvest levels in areas that may effect economic viability of mills and communities effected by both Forests. In the Plan itself, the targeted green volume to be offered in the Lander area has been raised from the economically-efficient level of 290 MBF per year to 500 MBF per year to help support a local mill.

Timber sales selected through the forest planning process have been selected to maximize present net value. Data is based on historic selling value and experienced costs. It is anticipated that future sales will not be below cost sales according to present knowledge of selling values and costs. Wildlife and recreation values, though produced, were not included in calculations done for the purposes of selecting sales for harvest.

In response to numerous concerns, the analysis procedure and model used for selecting areas to be managed for timber was examined and modified between draft and final EIS. Results of these changes reduced the number of acres managed for timber harvest and the resultant amount of roads in the final Plan. In the next fifty years, the Plan projections calls for only eighty miles of new road construction which will be open to the public. There will be 120 miles of existing road which will be reconstructed and remain open to the public. An additional 150 miles of new road, and 255 miles of reconstructed existing roads will be closed to the public within the 50 year period. Road construction and reconstruction figures have been corrected in both documents. The confusion caused by lumping road construction and reconstruction has been eliminated by separating these items.

In general, the Wyoming Game and Fish Department comments contained few concerns related to the timber program as proposed in the Forest Plan, considering such factors as dispersion, road management, and harvest methods. The Forest Service and Wyoming Game and Fish Department both recognize that all factors will be examined on a site-specific basis for each timber sale proposal. This analysis will include Wyoming Game and Fish Department consultation as well as internal and external scoping. As stated in the Errata Sheet to Proposed Plan Chapter III (which has been incorporated into the Forest Plan Chapter III), every project will require a site-specific environmental analysis.

The analysis did not directly attribute wildlife and recreation benefits to timber harvest and associated roads. The economic harvest level was based on timber economics alone and prescriptions were available which called for high recreation and wildlife emphasis without timber harvest. Roads needed for

timber were not the controlling factor in design of analysis area prescriptions but rather the mix of recreation opportunities needed or targeted. Roads only benefited recreation if they helped achieve the targeted recreation opportunity.

The planning process used did not assume that increased roading automatically benefited recreation. The relation of roads (existing and new) to recreation varies depending on the recreation opptunities being provided. Briefly, there are no roads allowed in primitive areas, no open roads allowed in semiprimitive nonmotorized areas, only a certain density of roads allowed in semiprimitive motorized areas, and few restrictions on roads in roaded natural and rural areas. Prescriptions for individual areas were developed based on providing a targeted mix of recreation opportunities in that area. In or near that portion of an area targeted for primitive recreation, roads do not benefit, and in fact are a detriment, to recreation. In that portion of an area targeted for semiprimitive nonmotorized recreation, roads will not benefit and may or may not be a detriment to recreation depending on location and road management. In areas targeted for motorized recreation, additional roads can benefit recreation.

The alternatives contained in the DEIS offer a balanced mix of recreation opportunities from the most highly developed (rural) to the most undeveloped (pristine wilderness) based on analysis of area-specific and Forest-wide historical and projected use. The mix of recreation opportunities provided by the alternatives in the FEIS has not been changed significantly. The capacity for roadless recreation exceeds projected use to a greater extent than the capacity for roaded recreation exceeds projected use. In addition, problems of concentrated use in the roaded recreation categories call for a better distribution of opportunities in order to provide the high quality of recreation opportunities intended in the preferred alternative. To keep all currently roadless areas roadless limits opportunity to meet demand for high quality recreation in other recreation categories. (Refer to the synopsis of comments on roadless area management).

To state that roads harm wildlife is an oversimplification. Certainly they can be very harmful to wildlife. Proposals to build roads into roadless areas are done in an interdisciplinary fashion to consider all resource management needs. The Forest Service mission is not only to protect wildlife but also to provide a mix of recreation opportunities and produce timber and quality water, among other goods and services. Only 80 miles of the 230 miles of new roads prjected by the Plan will be open for public use. Because use of roads by the public is the greatest threat to wildlife, seasonal restrictions designed to protect wildlife are imposed even on those 80 miles which pass through wildlife sensitive areas. Scheduling of road construction, location of roads, and management of completed roads can be controlled such that wildlife is not harmed.

Effects of open roads on wildlife can be severe. For this reason, the plan imposes seasonal road closures on all roads passing through crucial preferred winter range and calving areas. Further, the plan calls for all roads built for timber management alone, to be closed to public use. Analysis of the costs of constructing and managing such roads was included as part of the analysis of the planned timber harvest schedule. The only areas selected for timber management were where timber harvest alone could pay for the required roads.

This is the primary reason over 55,000 acres of tentatively suitable timberland are not included as part of the suited base to be managed for timber production.

From a Forest-wide perspective, the limiting factor for such species as deer, elk and bighorn sheep is winter range not cover. However, preserving cover is of general concern Forest-wide in order to provide the optimum 40/60 percent cover to forage ratio. There are many areas on the Forest where just the opposite situation exists. In these areas, timber grows well and the ratio is skewed toward too much cover. This is of particular concern along migration routes between summer and winter ranges. In these areas, standards for timber harvest are imposed which call for harvesting in such a way as to have optimum benefit for wildlife. The amount of this Forest-wide is insignificant given that less than 0.4 percent of the Forest will be harvested in any single ten year period. The effect can be quite significant, though, in specific areas of the Forest. Because of this, these standards were chosen and the benefits to deer and elk included in Chapter IV of the EIS.

When dealing with such considerations of cover to forage ratios, forest-wide statistics provide little aid. The specific patterns of vegetation within a relatively small area (5000 to 10,000 acres) must be examined. Models and analysis used in formulation and analysis of alternatives dealt with these considerations on an analysis area by analysis area basis, often moving to subanalysis area levels of site specificity. Approaching formulation and analysis of alternatives in this manner allowed for moving away from forest-wide statistics and dealing with the specifics of each area in a realistic manner. Therefore conclusions based on forest-wide statistics may have little validity without in-depth review of analysis area by analysis area results.

The Forest sees no reason to lower harvest levels below the level shown to be economically efficient.

Roadless Area Management

Synopsis of Comment. Many respondents felt that all currently roadless areas should remain so and that the demand for roadless recreation currently exceeds, and will in the future far exceed, the demand for roaded recreation. Another group of respondents expressed the view that there is already enough or perhaps too much wilderness on Shoshone National Forest and that roadless areas should be developed.

Reponse. The alternatives contained in the DEIS offer a balanced mix of recreation opportunities from the most highly developed (rural) to the most undeveloped (pristine wilderness) based on analysis of area-specific and Forest-wide historical and projected use. The mix of recreation opportunities provided by the alternatives in the FEIS has not been changed significantly. The capacity for roadless recreation exceeds projected use to a greater extent than the capacity for roaded recreation exceeds projected use. In addition, problems of concentrated use in the roaded recreation categories call for a

better distribution of opportunities in order to provide the high quality of recreation opportunities intended in the preffered alternative. To keep all currently roadless areas roadless limits opportunity to meet demand for high quality recreation in other recreation categories.

The Shoshone National Forest is 57 percent wilderness. The Wyoming Wilderness Act of 1984 specifically mentions release of lands not designated as wilderness for multiple use, specifically rejects the concept of nonwilderness buffers around designated wilderness, and states that lands not designated as wilderness need not be managed to preserve wilderness character. Many of the nonwilderness areas are protected from development because of being critical for wildlife, unproductive for wood fiber production, or critical for visual corridors. Regardless of entry into a few of the many remaining roadless areas, the Forest will remain overwhelmingly unroaded and more or less undeveloped. Our charter is to manage for multiple-use to maximize net benefits to the American public, not just preservation, and this involves balancing competing interests to define an appropriate mix of goods and services while maintaining the viability of ecosystems.

The uses of the Forest other than preservation and nonmotorized recreation, such as wood fiber production, domestic livestock production, oil and gas development, developed recreation, and motorized recreation are appropriate and are set at levels that will maximize net public benefit. The Forest Service feels that these more commodity-oriented uses have been provided in-balance with the noncommodity uses in the preferred alternative.

Clarks Fork River

Synopsis of Comment. Response was overwhelmingly in favor of preservation of the Clarks Fork River as a Wild and Scenic River. One respondent emphasized the need to preserve all options regarding management of the river.

Response. The Proposed Plan incorrectly stated that theForest Service can apply for an extension of the protection period for the River. It is contingent upon an Act of Congress to protect the River either by including it in the Wild and Scenic River System or by providing additional temporary protection. It is uncertain at this point whether the Clarks Fork of the Yellowstone River will become a part of the National Wild and Scenic Rivers System. The Forest Service and the Administration are in favor of the River's inclusion. Management activities that are within the discretion of the Forest Service will be designed to maintain the River's eligibility. Other activities that are presently within the discretion of agencies such as Bureau of Land Management (minerals) or Federal Energy Regulatory Commission (hydropower development) could affect eligibility characteristics of the Clarks Fork. In the event such developments are proposed, the Forest Service would recommend denial to the appropriate agency, until Congress acts.

Designation of the Clarks Fork River as a Wild and Scenic River or management of the river to preserve its eligibilty for Wild and Scenic River designation does not foreclose any management options.

Actual Comments and Specific Forest Service Responses

This section displays the actual written public comment and the Forest Service written response. As each letter was received, it was assigned a number. For example the 71st letter received was numbered as 71. Each letter was then examined to identify points which called for a response. Some letters had many such points. Each point was also assigned a number, for example, the third point in a letter was assigned the number 3. In this way, a compound number, 71-3, identifies the third point within letter 71. This is the numbering scheme used throughout this Chapter to refer to comment points and responses. (In some cases, the original numbering of comments within a letter was altered, causing a number to be skipped.)

Table VI-1 indexes the comments by listing the public respondents in the order in which letters were received. Table VI-2 indexes the letters by listing respondents alphabetically according to their affiliation (individual, agency, organization, or business). Table VI-3 indexes the comments and responses by subject matter. The comments received (letters) are duplicated after Table VI-3. Please note that each letter generally addresses a number of subjects or concerns. Each letter is identified by a number, assigned when received, and each comment within that letter is identified by a bracket and another number. Forest Service responses to each comment are identified by a hyphenated number corresponding to the letter and point within the letter.

Forest Service responses may refer to the proposed Plan, the Forest Plan, the draft EIS, the final EIS and, at times, the Plan or EIS. References to the Plan or EIS should be regarded as references to the final documents. Other usages are self-explanatory.

TABLE VI-1

Numerical Listing of Public Comments on the Draft EIS and Proposed Plan in the Order Received

Comment Number	Name of Individual, Business, Organization, or Agency
1	Bear Creek Hunting Camp Francis, Fox
2	Benson, Scott
3	Chevron U.S.A. Inc. Northern Region Richard Hughes, Staff Analyst
4	Wyoming Farm Bureau Federation Natural and Environmental Resources Committee Dave Raynolds, Chairman
5	Payne, James
6	Woods, A. C.
7	[illegible], Leonard
8	Taylor, Meredith
9	Nellis, Lee
10	Manchak, A.
11	Osborne, James, Jr.
12	ZK Outfitters Rice, Gary
13	Pearson, Mark
14	Compton, Glenn
15	Anderson, Richard
16	Minick, James
17	Lewis, Wayne
18	Goldsmith, Kenneth
19	Neal, Chuck
20	Lewis, Linda
21	Northwest Community College Life and Health Science Div. Wes Vining, Chairman
22	Taylor, Meredith
23	Continental Divide Trail Society James Wolf, Director
24	Bryant, Steve
25	Lewis, Wayne
26	Lewis, Linda
27	Bennett, Clark
28	Bennett, Byron
29	Feakes, Nancy
30	Catterton, Mike
31	Michael Bader
32	Harris, Bucky and Patti
33	Sandberg, Arne
34	Foundation for North American Wild Sheep Ted Bryant, Director of Admin.
35	Bucknam, Virginia
36	Elk Creek Ranch Hap Ridgway
37	American Mining Congress Thomas Nelson Assistant to the President
38	Clark, Celia
39	Wyoming Wood Products, Inc. Patrick Hickerson
40	Cody Lumber Mike Hanson, President
41	Benson, S.
42	Swanson, John
43	Conoco Mark Mosley, Division Manager
44	Wyoming Wildlife Federation Chris Peterson, Vice-President
45	Schultz, Harold
46	Ball, Gene
47	McMillen, Stew and Mimi
48	Texaco G. M. Barrow
49	Whiskey Mtn. Technical Committee John F. Sanders
50	Merry, Barbara
51	Wohl, Barry
52	Winants Ranch Rick McNeil, Manager
53	Martin, Evelyn
54	Lander Area Chamber of Commerce Russ Fuhr, President
55	Champlin Petroleum Company James Taylor, Staff Landman
56	Henderson, Terry
57	Hatcher, Douglas
58	Johnstone, Charles
59	Wyoming Chapter Sierra Club Meredith Taylor, Vice President
60	Benson, Scott
61	Neubert, Dr. Kent
62	Schwalbeuberg, Monica
63	McGee, Harriet
64	Dominick, Lee
65	Sandblom, Mary
66	Dubois Outfitters Association Gary Rice, President
67	Kroger, Richard
68	ARCO Oil and Gas Company Rocky Mountain District Dean Moses, Public Lands Coord.
69	Cochrane, Hazel
70	Estes, Dan and Carole
71	French, Jerry
72	Zacharias, Archie
73	City of Lander, Wyoming Del McOmie, Mayor
74	Cheeney, Larry
75	Bell, Tom
76	Kotarski, Felix
77	Absaroka Ranch Robert Betts, Jr., Owner
78	Sucharda, Rudolph
79	Kenney, Michael
80	Howe, Duane

TABLE VI-1 (Continued)

Numerical Listing of Public Comments on the Draft EIS and Proposed Plan in the Order Received

Comment Number	Name of Individual, Business, Organization, or Agency
81	Wyoming Game & Fish Dept. Bill Morris, Director
82	Institute of Math. Statistics William Guenther, Editor
83	Denton, Jeff
84	Wyoming Heritage Society Harry Roberts, Exec. Director
85	Park County Resource Council John McGee, Secretary
86	Wyoming Outdoor Council Robert Means, Board Member
87	Wyoming Native Plant Society Erwin Evert, Vice-President
88	Evert, Erwin
89	Ishawooa Construction Company J. Nichols Patrick
90	Krieg, Joe
91	Papp, Lawrence
92	The Western Wilderness of Gary Keimig Keimig, Gary
93	Berry, Michael
94	Welch, Jack
95	Dieterich, Sally
96	Bales, Art and Shirley
97	State of Wyoming Office of the Governor Ed Herschler, Governor
98	Bitterroot Ranch Bayard Fox
99	Petroleum Association of Wyoming Wendy Frueauf, Assoc. Director
100	True Oil Company Robert Byron, Chairman IPAA Public Lands Committee
101	Wyoming State Legislature Barbara Dobos, Representative
102	Marathon Oil Company Bradley Penn, Land Coordinator
103	Lewis, Wayne
104	Lewis, Linda
105	Ruff, Mrs. Birnie
106	Stewart, William
107	Johnson, Vanessa
108	Massie, Michael
109	Bove, Clifford
110	Siggins, Alan and Deanna
111	Kahin, Sharon
112	Flaherty, Diane Bugas
113	Lewis, Linda
114	Zeman, Lloyd
115	Manchak, A.
116	Nordberg, Ron
117	Roberts, Dave
118	Western Forest Industries Assoc Scott Horngren Timber Supply Specialist
119	Sargent Ranch Sandy Sargent
120	Garrett, Roger
121	Hittel, F. Earline
122	Hot Springs County Sportsman's Association Glenn Bishop, President
123	Maughan, Ralph
124	Fauskee, Bruce
125	Land, Dorman
126	Poole, Steven
127	Miller, Neil and Jennifer
128	Wyoming Chapter Sierra Club Snowy Range Group Jeffrey Foster, Chairman
129	The University of Wyoming Dept. of Geology and Geophysics Beverly DeVore
130	Wildlife Management Institute Daniel Poole, President
131	Taylor, Tory
132	Larson, Rachel
133	Preston, John
134	Dubois Wildlife Association
135	Wyoming State Legislature Bob Baker, Representative
136	Wyoming Farm Bureau Federation Natural and Environmental Resources Committee Dave Raynolds, Chairman
137	Phillips Petroleum Company Western Division H. Love, Jr., Land Manager
138	Collins, Harvey
139	Ratcliff, Elmer
140	Lundvall, Gary
141	King, Vicki Gill
142	Chadwick, Lynne
143	Wilbert, Connie
144	The Wildlife Society Dave Lockman, President
145	Wyoming State Legislature Harry Tipton, Representative
146	U.S. Dept. of Interior Bureau of Land Management Lander Resource Area Jack Kelley, Area Manager
147	Ballard, Mr. and Mrs. Fred
148	Julien Construction Company H. W. Julien
149	Stannard, Marty
150	Oudin, Dee
151	Model, Anne
152	Seven D Ranch Marshall Dominick
153	Bryson, Andrew

TABLE VI-1 (Continued)

Numerical Listing of Public Comments on the Draft EIS and Proposed Plan in the Order Received

Comment Number	Name of Individual, Business, Organization, or Agency
154	U.S. Dept. of Interior Office of the Secretary Office of Enviromental Project Review Robert F. Sewart Regional Environmental Officer
155	Rocky Mountain Oil and Gas Assoc. Alice Frell, Public Lands Dir.
156	Laramie Alpine Audobon Chapter Leva Stafford
157	Reed, Stephen
158	Hassler, Barbara
159	Weiss, W. D.
160	Valley Ranch Dr. Oakleigh Thorne, II President
161	Wyoming Chapter Sierra Club Sterling Evans
162	The Nature Conservancy Tom Wolf, Protection Planner
163	Louisiana-Pacific Corporation R. L. Baker, Chief Forester
164	Outdoors Unlimited, Inc. Marlene Simons, President
165	Thompson, Bruce
166	Wyoming Chapter Sierra Club Philip Hocker, National Treasurer
167	Inberg, Judy
168	Shelley, B. Weldon and Sherry
169	Hancock Ranch John Winsor
170	Savage, Thomas
171	Thorofare Outfitting Don Schmalz
172	Wyoming Game and Fish Department Joe Brandl, East Fork Manager
173	Fisby, Donald
174	Carlman, Leonard
175	The Gem Shop, Inc. Eugene Mueller, President
176	Stevens, Robert, Jr.
177	Amoco Production Company Denver Region Roberta Anderson Public Lands Coordinator
178	Snyder Oil Company John Amen, Vice-President/Land
179	Phillips, Dawn
180	Cody Country Outfitters and Guides Association Dale Good, President
181	U.S. Environmental Protection Agency Region VIII Environmental Assessment Branch Dale Vodehnal, Chief
182	Greater Yellowstone Coalition Bob Anderson, Executive Director
183	Deromedi, John
184	Gordon, Margaret
185	The National Outdoor Leadership School Jim Ratz, Executive Director

TABLE VI-2

Alphabetical Listing of Public Comments Received on the Draft EIS and Proposed Plan (by Group)

BUSINESS NAME	COMMENT NUMBER
Absaroka Ranch Robert Betts, Jr., Owner	77
American Mining Congress Thomas Nelson Assistant to the President	37
Amoco Production Company Denver Region Roberta Anderson Public Lands Coordinator	177
Anderson, Richard	15
ARCO Oil and Gas Company Rocky Mountain District Dean Moses, Public Lands Coord.	68
Bear Creek Hunting Camp Francis, Fox	1
Bitterroot Ranch Bayard Fox	98
Champlin Petroleum Company James Taylor, Staff Landman	55
Chevron U.S.A., Inc. Northern Region Richard Hughes, Staff Analyst	3
Cody Lumber Mike Hanson, President	40
Conoco Mark Mosley, Division Manager	43
Elk Creek Ranch Hap Ridgway	36
The Gem Shop, Inc. Eugene Mueller, President	175
Hancock Ranch John Winsor	169
Ishawooa Construction Company J. Nichols Patrick	89

BUSINESS NAME	COMMENT NUMBER
Julien Construction Company H. W. Julien	148
Louisiana-Pacific Corporation R. L. Baker, Chief Forester	163
Marathon Oil Company Bradley Penn, Land Coordinator	102
The National Outdoor Leadership School Jim Ratz, Executive Director	185
Osborne, James, Jr.	11
Petroleum Association of Wyoming Wendy Frueauf, Assoc. Director	99
Phillips Petroleum Company Western Division H. Love, Jr., Land Manager	137
Rocky Mountain Oil & Gas Assoc. Alice Frell, Public Lands Dir.	155
Sargent Ranch Sandy Sargent	119
Seven D Ranch Marshall Dominick	152
Snyder Oil Company John Amen, Vice-President/Land	178
Texaco G. M. Barrow	48
Thorofare Outfitting Don Schmalz	171
True Oil Company Robert Byron, Chairman IPAA Public Lands Committee	100
Valley Ranch Dr. Oakleigh Thorne, II President	160

BUSINESS NAME	COMMENT NUMBER
Western Forest Industries Assoc. Scott Horngren Timber Supply Specialist	118
The Western Wilderness of Gary Keimig Gary Keimig	92
Winants Ranch Rick McNeil, Manager	52
Wyoming Wood Products, Inc. Patrick Hickerson	39
ZK Outfitters Gary Rice	12

INDIVIDUAL NAME	COMMENT NUMBER
Bader, Michael	31
Bales, Art & Shirley	96
Ball, Gene	46
Ballard, Mr. & Mrs. Fred	147
Bell, Tom	75
Bennett, Byron	28
Bennett, Clark	27
Benson, S.	41
Benson, Scott	2
Benson, Scott	60
Berry, Michael	93
Bopp, Leonard	7
Bove, Clifford	109
Bryant, Steve	24
Bryson, Andrew	153
Bucknam, Virginia	35
Carlman, Leonard	174
Catterton, Mike	30
Chadwick, Lynne	142
Cheeney, Larry	74
Clark, Celia	38
Cochrane, Hazel	69

TABLE VI-2 (Continued)

Alphabetical Listing of Public Comments on the Draft EIS and Proposed Plan (by Group)

INDIVIDUAL

NAME	COMMENT NUMBER
Collins, Harvey	138
Compton, Glenn	14
Denton, Jeff	83
Deromedi, John	183
Dieterich, Sally	95
Dominick, Lee	64
Estes, Dan & Carole	70
Evert, Erwin	88
Fauskee, Bruce	124
Feakes, Nancy	29
Fisby, Donald	173
Flaherty, Diane Bugas	112
French, Jerry	71
Garrett, Roger	120
Goldsmith, Kenneth	18
Gordon, Margaret	184
Harris, Bucky & Patti	32
Hassler, Barbara	158
Hatcher, Douglas	57
Henderson, Terry	56
Hittel, F. Earline	121
Howe, Duane	80
Inberg, Judy	167
Johnson, Vanessa	107
Johnstone, Charles	58
Kahin, Sharon	111
Kenney, Michael	79
King, Vicki Gill	141
Kotarski, Felix	76
Krieg, Joe	90
Kroger, Richard	67
Larson, Rachel	132
Land, Dorman	125
Lewis, Linda	20
Lewis, Linda	26
Lewis, Linda	104
Lewis, Linda	113
Lewis, Wayne	25
Lewis, Wayne	17
Lewis, Wayne	103
Lundvall, Gary	140

INDIVIDUAL

NAME	COMMENT NUMBER
Manchak, A.	10
Manchak, A.	115
Martin, Evelyn	53
Massie, Michael	108
Maughan, Ralph	123
McGee, Harriet	63
McMillen, Stew & Mimi	47
Merry, Barbara	50
Miller, Neil & Jennifer	127
Minick, James	16
Model, Anne	151
Neal, Chuck	19
Nellis, Lee	9
Neubert, Dr. Kent	61
Nordberg, Ron	116
Oudin, Dee	150
Papp, Lawrence	91
Payne, James	5
Pearson, Mark	13
Phillips, Dawn	179
Poole, Steven	126
Preston, John	133
Ratcliff, Elmer	139
Reed, Stephen	157
Roberts, Dave	117
Ruff, Mrs. Birnie	105
Sandberg, Arne	33
Sandblom, Mary	65
Savage, Thomas	170
Schultz, Harold	45
Schwalbeuberg, Monica	62
Shelley, B. Weldon & Sherry	168
Siggins, Alan & Deanna	110
Stannard, Marty	149
Stevens, Robert, Jr.	176
Stewart, William	106
Sucharda, Rudolph	78
Swanson, John	42
Taylor, Meredith	8
Taylor, Meredith	22

INDIVIDUAL

NAME	COMMENT NUMBER
Taylor, Tory	131
Thompson, Bruce	165
Weiss, W. D.	159
Welch, Jack	94
Wilbert, Connie	143
Wohl, Barry	51
Woods, A. C.	6
Zacharias, Archie	72
Zeman, Lloyd	114

ORGANIZATION

NAME	COMMENT NUMBER
Cody Country Outfitters & Guides Association Dale Good, President	180
Continental Divide Trail Society James Wolf, Director	23
Dubois Outfitters Association Gary Rice, President	66
Dubois Wildlife Association	134
Foundation for North American Wild Sheep Ted Bryant, Director of Admin.	34
Greater Yellowstone Coalition Bob Anderson, Executive Director	182
Hot Springs Country Sportsman's Association Glenn Bishop, President	122
Institute of Math. Statistics William C. Guenther, Editor	82
Lander Area Chamber of Commerce Russ Fuhr, President	54
Laramie Alpine Audobon Chapter Leva Stafford	156

TABLE VI-2 (Continued)

Alphabetical Listing of Public Comments on the Draft EIS and Proposed Plan (by Group)

ORGANIZATION

NAME	COMMENT NUMBER
The Nature Conservancy Tom Wolf, Protection Planner	162
Northwest Community College Life & Health Science Division Wes Vining, Chairman	21
Outdoors Unlimited, Inc. Marlene Simons, President	164
Park County Resource Council John McGee, Secretary	85
The University of Wyoming Dept. of Geology & Geophysics Beverly DeVore	129
Wildlife Management Institute Daniel Poole, President	130
The Wildlife Society Dave Lockman, President	144
Wyoming Chapter Sierra Club Sterling Evans	161
Wyoming Chapter Sierra Club Snowy Range Group Jeffrey Foster, Chairman	128
Wyoming Chapter Sierra Club Philip Hocker, Nat'l. Treasurer	166
Wyoming Chapter Sierra Club Meredith Taylor, Vice-President	59
Wyoming Farm Bureau Federation Natural & Environmental Resources Committee Dave Raynolds, Chairman	4
Wyoming State Legislature Natural & Environmental Resources Committee Dave Raynolds, Chairman	136
Wyoming Heritage Society Harry Roberts, Exec. Director	84

ORGANIZATION

NAME	COMMENT NUMBER
Wyoming Native Plant Society Erwin Evert, Vice-President	87
Wyoming Outdoor Council Robert Means, Board Member	86
Wyoming Wildlife Federation Chris Peterson, Vice-President	44

AGENCY

NAME	COMMENT NUMBER
City of Lander, Wyoming Del McOmie, Mayor	73
State of Wyoming Office of the Governor Ed Herschler, Governor	97
U.S. Environmental Protection Agency Region VIII Environmental Assessment Branch Dale Vodehnal, Chief	181
U.S. Dept. of Interior Bureau of Land Management Lander Resource Area Jack Kelley, Area Manager	146
U.S. Dept. of Interior Office of the Secretary Office of Environmental Project Review Robert F. Stewart Regional Environmental Officer	154
Whiskey Mtn. Technical Committee John F. Sanders	49
Wyoming Game & Fish Department Joe Brandl, East Fork Manager	172
Wyoming Game & Fish Dept. Bill Morris, Director	81

AGENCY

NAME	COMMENT NUMBER
Wyoming State Legislature Bob Baker, Representative	135
Wyoming State Legislature Barbara Dobos, Representative	101
Wyoming State Legislature Harry Tipton, Representative	145

TABLE VI-3

Index of Comments

Subject	Comment Number
Air Quality	41-12, 59-55, 86-3, 154-14, 154-27, 154-34, 182-59
Alternatives	
Bias against/for commodities	48-2, 68-1, 100-4, 102-1, 105-1, 130-11, 137-6, 155-2, 178-4, 185-3
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Comment 1

Forest Service Response

FPD - 1 - F - L - B
Proj. No. Orig Type

RECEIVED JUL 1 5 1985

Bear Creek Hunting Camp

Fran Fox
Crowheart, Wyo. 82512
Phone 307-486-2215
July [illegible], 1985

[illegible]
[illegible] National Forest
[illegible]
[illegible], Wyoming [illegible]

[illegible];

The Forest Service proposal to issue seven new commercial [illegible] camp sites on the Shoshone National Forest, if realized, [illegible] considerable [illegible] to the outfitting industry and [illegible] to the [illegible] public.

[illegible] for the limited non-resident hunters who hire [illegible] outfitters is very [illegible]. Currently there are not enough [illegible] licenses issued by the Wyoming Game & Fish to [illegible] permitted camps in the state. Creating seven [illegible] can only thin the number of those available outfitted [illegible] and eventually weaken the industry as a whole.

[illegible] public land user who are cost-efficient [illegible] provide a needed and desirable service to [illegible] public. However, the recent [illegible] camp fees, insurance [illegible] competition from both permitted and rogue operators [illegible] burden to the integrity of the honest and [illegible].

[illegible] the condition of a viable and [illegible].

[illegible] potential camp site in the [illegible]'s Hole area [illegible]. This is an area that is inundated with [illegible] from September 25th through [illegible].

[illegible] from a camp in this area [illegible] the South [illegible] slope of [illegible] already used by an established [illegible] topography of the area between [illegible] would be forced to ride through [illegible] to [illegible].

[illegible] new potential hunting [illegible] from the 1985 Forest Plan.

Sincerely yours,

Francis S. Fox

1

1-1 The public response to the proposed new outfitter/guide camps has been overwhelmingly negative. Therefore, no new outfitter/guide camps are allocated in the Forest Plan.

Comment 2

RECEIVED JUL 1 6 1985

FPD - 2 - F - V - C
Proj. No. Orig Type Affil

FOREST WIDE - I FEEL FIRE SUPPRESSION EFFORTS SHOULD BE CURTAILED EVEN MORE 1

- FEWER ROADS SHOULD BE CONSTRUCTED - THEN DESTRUCTED AFTER LOGGING 2

- WILDLIFE SHOULD TAKE A HIGHER PRIORITY TO TIMBER HARVEST. 3

Comments by Scott Benson 7/16/85
P.O. Box 741
Dubois
JP

Forest Service Response

2-1 The importance of fire in its natural role in the ecosystem has been recognized, and the fire suppression guidelines in Appendix F of the Plan has been further liberalized between the proposed and final Forest Plan.

2-2 In response to numerous concerns, the number of acres managed for timber harvest and the resultant amount of roads has been reduced in the final Plan. In the next fifty years, the Plan projects only eighty miles of new road which will be open to the public. There is projected 120 miles of existing road which will be improved and remain open to the public. An additional 150 miles of new road, and 255 miles of reconstructed existing roads are projected to be closed to the public within the 50 year period. Road construction and reconstruction figures have been corrected. See also response to comments 182-5, 33-9, 80-5, and 44-46.

2-3 Timber harvesting is an activity that will benefit wildlife through enhanced habitat capability and diversity. Stringent standards for wildlife are incorporated into harvest methods, activities and timing.

Comment 3

Forest Service Response

RECEIVED JUL 2 2 1985

FPD - 3 - 0 - L - B
Proj. No. Orig Type Affil

Chevron U.S.A. Inc.
700 South Colorado Blvd., P. O. Box 599, Denver, CO 80201

July 17, 1985

Richard T. Hughes
Staff Analyst
Legislative and Regulatory Affairs

Shoshone National Forest
Draft LRMP/EIS

Mr. Stephen P. Mealey
Shoshone National Forest
P. O. Box 2140
225 West Yellowstone Ave.
Cody, Wyoming 82414

Dear Mr. Healey:

Thank you for the opportunity to review and comment on the captioned documents. You and your staff should be complimented for a technically outstanding job done in preparation of the Draft Plan/EIS. The analysis and display techniques used in the Shoshone Draft are among the most sophisticated we have seen in Forest Plans to date.

Unfortunately, despite the professionalism demonstrated in the technical aspects of the documents, the Plan's bias against oil and gas activity is obvious. Chevron is not currently active on the Shoshone National Forest, so it is impossible to predict precisely how the Plan might affect us. Still, we recognize the Shoshone as an area extremely prospective for oil and gas development and we reserve the right to challenge decisions made under the Plan which would adversely affect operations we might propose on the forest. 1

3-1 See response to comment 68-5.

Sincerely,

Richard T. Hughes

RTH/bs

Comment 4

FPD- 4- W- L- E

RECEIVED JUL 2 3 1985 SHOSHONE NATIONAL FOREST Orig Type Afd July 17, 1985

Preliminary Comments on July 1985 Draft Plan

- - Dave Raynolds
Chairman, Natural and Environmental Resources Committee
Wyoming Farm Bureau Federation

This brief preliminary comment notes two problems and one conclusion.

Problem #1: The Forest Service is suffering severe management problems, chiefly imposed by Washington, and not by the field staff. The executive branch is providing weak direction, Congress is enacting contradictory legislation, and the courts too are fumbling. The voluminous documentation presented tonight is prima facia evidence of management confusion. In recent hearings on Wyoming land interchange in three cities, not a single individual spoke in favor of the abortive Forest Service-BLM plan. Finally, on the ground in the Lander area we can see vivid proof of management failures. The forest is dying from pine beetle and we risk a firestorm from South Pass to Cody. Our mountain lakes have been poisoned by human waste, and the water is infested by giardia and unfit to drink. Field staff has been unable to correct these problems without Washington support. We must now work together, locally, to clean up the mess where it is -- in Washington.

Problem #2: The draft EIS sets out various alternatives, including a Forest Service preferred Plan D, which costs more, and a plan E, which considers budget cuts. Only a budget cut scenario is realistic, but the one in the EIS keeps all the office staff, and cuts back the few activities which generate fees. A new plan E should be drafted that stabilizes forest use patterns while eliminating the congestion around the office coffee pot.

Conclusion: It's time to implement "multiple use" in the Shoshone National Forest on an honest basis. Grazing of cattle, horses and sheep involves less than 12% of the area. Timbering involves only something like 3/10ths of 1% in a decade, or 4% in a century. Minerals involve only a tiny acreage. These are the only areas of multiple use, or possible multiple use. All remaining acreage, over 85% of the total, is devoted exclusively to recreation. At the moment an estimated 1 million visitor days impact the forest, most without any payment. If there are some 30,000 tourist user months, perhaps a fee of a dollar per T.U.M. might be fair. No need for the Forest Service to attempt an impossible collection job; it could be done by Park and Fremont Counties, perhaps with contributions from tourist facilities like motels and restaurants.

At present the Forest Service spends less than 5¢ per acre, throughout the Rocky Mountain West, on the rangeland it manages; this isn't stewardship, it's abandonment. User fees end up on paper shuffling projects in the office. Users have to be more vigilant about how their fees are spent. If we begin to make a small contribution for the tourist visitors, we'll be as alert as the outfitters, NOLS and other paying users are to the recreational heritage.

Shoshone is really our first national forest. Let's try to make it one of the best.

Forest Service Response

2 4-2 Alternative A, the current Direction Alternative, represents the historical culmination of over 85 years of land management on the Shoshone National Forest. As such, it does represent "stabilized forest use patterns," thereby negating the need to prepare a new Alternative E, Reduced Budget Alternative. It is recognized that adoption of Alternative E would disrupt historical use patterns and make it difficult, if not impossible, to maintain these patterns in the short term.

3 4-3 While it does appear that a large percentage of the forest is devoted to recreational uses, there are several reasons for this. To begin with, 57% of the land base has been congressionally designated as wilderness under the 1964 Wilderness Act. This designation precludes "multiple use" in the traditional sense except that grazing and nonnotorized forms of recreation are permissible. Much of the remainder of the forest is topographically or vegetatively not suitable for grazing, timbering, mineral development, or other uses. In summary, recreation is the highest and best use of much of the Shoshone National Forest, but the Plan does attempt to devote a reasonable proportion of the forests' resources to all uses. See also response to comments 44-46 and 131-6.

Comment 5

Forest Service Response

RECEIVED JUL 1 3 1985

RR 60 Box 906
Dubois, WY 82513
7-18-85

FPD - 6 - F - L - C
Proj. No. Orig Type Affil

Tom Portice
District Ranger
Box 186
Dubois, WY 82513

Dear Mr. Portice:

This letter is subsequent to our conversation in your office on 7-17-85 when you said this information will be forwarded to Steve Healey, Forest Supervisor, in Cody.

My complaints against your proposed road and logging in the 5 Mile Creek and 6 Mile Creek drainages of the DuNoir Valley are in three categories, detrimental effects on wildlife, unnecessary below cost timber sale loss for the general public, and road building and logging in a geological unstable area with the probable resultant erosion and massive land movement down the mountain side.

As year around residents up here in the Northeast DuNoir Valley with my land next to the Forest on the North and East, we observe the spring and fall migration of the elk through this area. Road building and logging would put man in this migration route and expose the Elk to more stress with the result of fewer elk eventually coming this way. They already have to run the "Gauntlet" in the fall with ready access to their migration route offerred by the Horse Creek road and the many branches extending from it. This new road would extend the pressure further into their migration path. The pressure toward Jackson on the way to the National Elk Refuge has resulted in more using this route, but your proposed plan would probably result in their being pushed north. Where is this loss of habitat to end? The Bighorn Sheep also use the meadows toward the south end of the Ramshorn Mt. and the higher timbered ridges beneath the sheer rock, but this proposed road would offer too easy access for man to get to these areas. 1

5-1 Seasonal road closures, particularly in the Spring will prevent disruption of the elk migration and calving areas. Harvesting of elk in the Fall is controlled by limited permits issued by the Wyoming Game and Fish Department. Timber sale layout and road locations will be designed to provide escape and hiding cover for migrating elk with road closures implemented if needed.

The lumber needs of the U.S. are easily filled from Northwest and Southern forests, so the low grade timber in the 5 & 6 Mile drainages, sold at below cost, with highly expensive road building to get the timber out, does not result in benefit to the general public. It only provides a few highly subsidized local jobs.

The unstable geological nature of this area should preclude road building and logging as proposed. If you look at the existing erosion in the northwest corner of the 5 Mile basin now, you will see what the rest of the steep slopes will look like after logging. An even more immediate threat would result east of my property with its house and barn. Even now with no road or logging the ground is slipping downward from the mountain towards us. I can take you, or any geologist you send, up to see this. When wet in the spring, slippage and erosion occur, but the natural forest cover absorbs some moisture, and when the mature trees tip over in the unstable soil, they form natural dams to slow the water. By logging the 5&6 Mile drainages above us, you will increase the threat to my property and to our lives should a massive slide occur. If an earth tremor should occur with wet soil and no timber, it could be the end for a large part of this area. Since you are being informed of this threat to my property and our lives, should any disaster occur after any road building or logging approved by you and others up the chain of command, I will hold each of you personally liable for having made that decision. 2

5-2 There are areas of unstable soils in this area. The silvicultural prescriptions for this area call for group selection and selection harvesting. These systems will not contribute to increased soil instability and areas of specific high hazards will be avoided in road location and sale layout. Seasonal road closures, particularly in the Spring, will prevent disruption of the elk migration and calving areas. Harvesting of elk in the Fall is controlled by limited permits issued by the Wyoming Game and Fish Department. Timber sale layout and road locations will be designed to provide escape and hiding cover for migrating elk with road closures implemented if needed.

Sincerely,
James C. Payne

To insure receipt of this letter it will be hand delivered to the Dubois Ranger Station with the date and time of delivery being noted on the copy.

Comment 6

Forest Service Response

RECEIVED JUL 2 9 1985

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Proj. No. Orig Type Afill

A. C. WOODS
P. O. Box 6573
LONGVIEW, TEXAS 75608

July 25, 1985

Mr. Stephen P. Mealey
Forest Supervisor
Shoshone National Forest
P. O. Box 2140
Cody, WY 82414

Dear Mr. Mealey:

I have reviewed the proposed Forest Plan (FORPLAN) and the Draft Environmental Impact Statement (DEIS) that your office sent to me and I would like to make the following comments on them:

I. Management Priorities. The Forest Plan management goals that I believe should receive the highest priority are:

(A) The recovery of the grizzly bear population;

(B) The protection and enhancement of wildlife and fish habitat;

(C) The improvement of opportunities for dispersed recreation;

(D) The preservation of primitive and semi-primitive areas which may qualify for wilderness designation in the future; and,

(E) The protection and enhancement of the visual resources of the forest.

II. Deficiencies in the FORPLAN and the DEIS. I have noted what I regard as two deficiencies in these documents which should be corrected. They are:

(A) Both the FORPLAN and DEIS fail to fully analyze the effects on the grizzly bear population of commodity related activities, such as oil and gas exploration, in grizzly bear habitat areas. The FORPLAN fails to provide adequate protection for grizzly habitat areas. Consider the following:

(1) The proposed FORPLAN provides only limited protection of grizzly management situation 1 habitat (MS-1) areas and no protection for management situation 2 habitat (MS-2) areas with respect to the impact of commodity related activities on the bears' use of these areas. | 1

(2) No data was presented in either the FORPLAN or the DEIS to document the level and frequency of grizzly usage of MS-1 and MS-2 areas. Data presented by researchers (i.e. Craighead et al) shows that the grizzly has a large annual range with some animals covering as much as 1,000 square miles in a single season. It is logical to assume that the bears, in the course of their annual travels, traverse the MS-2 areas as well as the MS-1 areas. | 2

6-1 We are following Greater Yellowstone Grizzly Bear Guidelines (GYGBG) for activities in Situation 1 and 2 and all projects will have Consultation with the Fish and Wildlife Service for clearance and mitigating measures. See also the Fish and Wildlife Service biological opinion on the Plan in Plan Appendix H.

6-2 Use (frequency and use) by grizzlies was used to classify Situation 1 and 2 originally. Annual frequency and use records are on file at the Supervisors Office to substantiate management direction.

Comment 6

Forest Service Response

Mr. Stephen P. Mealey
Page Two

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(3) No data was presented in either the FORPLAN or the DEIS to document the level of man-bear conflicts that have occurred in the past. No data was presented to identify the types of areas (i.e. MS-1, MS-2, etc.) in which incidents of man-bear conflicts and man-caused bear mortality have occurred. This information is essential to formulating a plan for the recovery of the grizzly bear population. **3**

6-3 There is a Grizzly Bear Recovery Plan which is referenced in the Forest Plan which discusses bear mortality. Specific locations and cause can be found in annual reports of the Interagency Study Team.

(4) No data was presented in either the FORPLAN or the DEIS to document the distance at which commodity related activities (e.g. oil and gas drilling) would result in the displacement of the grizzly from occupied habitat. Data presented by researchers has shown that grizzlies are frequently displaced by a hiker on foot who approaches within one-quarter of a mile of the bear. If a hiker on foot can cause the displacement of a bear at a distance of one-quarter of a mile, at what distance will an oil drilling rig cause their displacement? This information should be made a part of these documents. **4**

6-4 Data to date is limited and has been identified as a high priority need and such studies are currently underway. Requirements for distances in relation to seismic activities are identified in the 1984 EA for seismic activities. There are many variables which affect distances.

(5) Because of the proximity of MS-2 areas to MS-1 areas, it is logical to assume that commodity related activities on MS-2 areas could result in the displacement of the bears from adjacent MS-1 areas as well as lead to an increase in the number of man-bear conflicts. Neither the FORPLAN nor the DEIS adequately analyze the effects of commodity related activities on the grizzly. The FORPLAN needs to be revised to provide more protection for the grizzly bear. **5**

6-5 Adequate protection measures for the grizzly are in the Grizzly Bear Guidelines and in standards and guidelines of Chapter III of the Plan. Site-specific projects will be analyzed in accordance with National Environmental Policy Act and the Endangered Species Act.

(B) Both the FORPLAN and the DEIS fail to evaluate the social effects of the six Forest Plan alternatives on forest visitors who live outside of Park and Fremont counties. Consider the following:

(1) Table II-1 in the FORPLAN (p. II-7) shows that the combined population of Park and Fremont counties to be 59,106 persons. Table II-7 in the FORPLAN (p. II-28) shows that the current level of dispersed recreational usage to be 896,000 visitor/days per year. This suggests that a great deal of people who are not residents of either Park or Fremont counties are using the forest for recreation. No data was included in either the FORPLAN or the DEIS to show the levels (both current and projected) of dispersed recreational usage by forest visitors who live outside of Park and Fremont counties. How many of the 896,000 visitor/days represent persons living outside of Park and Fremont counties? **6**

6-6 The proportion of recreation users from outside Park and Fremont Counties varies by type of recreation. For example, nonresident hunting days comprise only about 22% of the hunting days on the Forest, while nonresident fishing is about 45% of the fishing days on the Forest and sight-seeing has even a greater percentage of nonresidents. The mix of recreation types and the quality level for that recreation included in formulation and analysis of alternatives are based on a number of studies and include consideration of the desires and probable recreation use by nonresidents.

(2) The social effects of the six alternative Forest Plans are analyzed in the FORPLAN (p. II-9 et seq.) and the DEIS (p. II-73 et seq.) with regard to only the residents of Park and Fremont counties. No analysis was made to show the social effects of the six alternatives on forest visitors who live outside of these two counties. In my opinion, the great majority of these people would receive the maximum benefits from alternative C, the non-commodity alternative. Outdoor recreation is increasing nationwide, with many

Comment 6

Mr. Stephen P. Mealey
Page Three

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people traveling long distances to use the national forests for recreational purposes. Your documents should consider the effects of the alternative plans on this group of people as well as on the residents of Park and Fremont counties. | 6

III. Recommendations. I would like to submit the following recommendations for your consideration:

(A) The DEIS should be revised to include the following information:

(1) The number and location of all observed man-bear conflicts and man-caused bear mortality during the past five years. This data should identify the areas (i.e. MS-1, MS-2, etc.) in which these incidents occurred. | 8

(2) Research data should be presented which establishes the distance from commodity related activities within which the grizzly may be displaced from occupied habitat. | 9

(3) A map should be included which identifies the grizzly management situation areas. | 10

(4) The number of visitor/days of dispersed recreational usage, both current and projected, by forest visitors who live outside of Park and Fremont counties. | 11

(5) The social effects of the six Forest Plan alternatives on the lifestyles, attitudes and beliefs of the forest visitors who live outside of Park and Fremont counties.

(B) The FORPLAN should recommend an immediate moratorium on oil and gas leasing and other commodity related activities in grizzly management situation 1 and 2 habitat areas. This moratorium should continue until a full grizzly bear population recovery has occurred. | 13

(C) Revise the FORPLAN to include appropriate resrictions on all commodity related activities in grizzly habitat areas after the recovery period. | 14

(D) Alternative C, the non-commodity alternative, should be adopted as the preferred alternative. | 15

Finally, I would like to express my appreciation to you and to all of the Forest Service personnel who helped prepare the FORPLAN and the DEIS for your work on these two documents. This planning process represents a real improvement in the management of forest resources and also provides for better public awareness of the policies and goals of the Forest Service.

Thank you for your consideration of these comments and requests.

Sincerely,

A. C. Woods

P.S. - I would appreciate it if you would also send me copies of the final revised FORPLAN and EIS when these become available.

Forest Service Response

Social impact analysis was done to look at impacts not dealt with through other means in the planning process. The Forest can only impact the attitudes, beliefs and lifestyles of nonresidents through the types of recreation and other goods and services provided. These considerations are represented by disaggregation of National and Regional demands for goods and services including recreation. Alternative F represents this disaggregation. Impacts on attitudes, beliefs and lifestyles of nonresidents beyond providing adaquate supply of goods and services as represented in this alternative are negligable. On the other hand, through the mix of goods and services produced and provided on the Forest and the manner in which this production is done, can have significant effects on the attitudes, beliefs and lifestyles of those directly impacted in local communities. These effects are not adaquately dealt with through pure production economics and demand/supply relationships. For this reason, two types of analysis were done: social impact analysis and economic impact analysis. These two analyses are interrelated and are designed to provide information not addressed elsewhere in the planning process. The focus of these analyses, is on local areas.

Through a combination of analysis of demands for various goods and services including National, Regional and local demands for dispersed recreation opportunities and augmenting this with information on those directly effected by management, the full spectrum of effects is presented and considered in formulation, analysis and selection of a preferred alternative.

6-8 See response to comment 6-3

6-9 See response to comment 6-4

6-10 A map has been included in the Forest Plan, Appendix H.

6-11 See response to comment 6-6.

6-13 No leasing is permitted in Situation I habitat except for no-surface occupancy on a case-by-case basis along the exterior 1/2 mile. Situation II areas are protected by stipulations in the "Grizzly Guidelines". In developing the "Guidelines" it was determined that oil and gas activities could be conducted under various restrictions that would not "jeopardize" the continued existance of the bear.

6-14 Upon recovery of the grizzly bear, the animal and its habitat is managed in cooperation with the Wyoming Game and Fish Department. Appropriate restrictions on activities would be similar to those of elk, bighorn sheep, etc., for protecting their habitat needs and in preventing human-grizzly conflicts.

6-15 Based on all analysis, the Forest Service believes that Alternative D presents a more balanced mix of Forest uses than Alternative C. Alternative D as a whole responds better to the issues and concerns identified.

Comment 7

Forest Service Response

RECEIVED AUG 6 1985

FPD - 7 - P - 4 - C
Proj. No. Orig Type Appl

Box 194
Meeteetse, Wyoming
August 4, 1985

Stephen P. Mealey
225 W. Yellowstone Ave.
P.O. Box 2140
Cody, Wyoming 82414

Dear Mr. Mealey,

The following are my comments on the Draft Environmental Impact Statement and Proposed Forest Plan. My choice of the alternatives is Alternative C and my reasons are, after listening to the district rangers of the Greybull District and Wapiti District, that is is the only alternative that does what alternative D says it will do. Alternative D states one thing in its abstract and reverses itself in its explanation. It states that cattle and timber production will remain the same but the cattle production will increase by 17 thousand AUMs. The same goes for the timber production, it is currently at 100 million board feet of which 75 million board feet is harvested and will increase to 110 million board feet. Both of these increases will have a detrimental effect on the Shoshone National Forest. Mineral activity on the Shoshone National Forest has already had a detrimental effect in both the Gold Reef area of the Greybull District and the well on the North Fork of the Shoshone. In each case the area has shown a drastic decrease in wildlife, especially Bighorn Sheep; so we need more restrictions. **1**

My comments on the Forest Plan will be directed at the Greybull Ranger District. My first major objection is road closure in the Meeteetse area. I feel the forest should be enjoyed by all people and at all times of the year. The proposed road closures from December to July are ridiculous and an insult to the people of the United States. There are no sound reasons to lock people out of the National Forest by these closures because weather and snow conditions restrict these roads anyway. A more sensible proposition would be road closures for short periods of time by the local district ranger when warranted.

Another area that needs more attention is the Eleanor/ Warhouse area. The biologists that prepared this report did not go into the area and count the wildlife that use it. This is one of the largest winter Mountain Sheep ranges in the Greybull district and should have one half of the cattle allotment taken out and possibly all of the cattle taken out since it is not being used at the present time. **3**

7-1 Alternative D does attempt to maintain current levels of range and timber production with slight increases in the future due to improved management. Such increases will not be at the expense of other non-commodity resources. Road closures are for the protection of wildlife, water and soils and these restrictions apply to mineral activities as well. There have been no decreases of bighorn sheep in either the Gold Reef or North Fork of the Shoshone due to mineral activities.

7-3 The Eleanor-Warhouse grazing allotment is designated a recreation horse allotment. All forage will be allocated to recreational stock or wildlife. No grazing of term permitted domestic livestock will be authorized.

Comment 7

Forest Service Response

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Another area that needs attention is the Wood River area along the Wood River Road. This area should not be a cattle allotment when the current leasee lets his lease expire. | 4

7-4 The area along the main fork of the Wood River will have cattle grazing at a level commensurate with available forage and other multiple-use values. Stocking of the allotment was reduced in 1985 to eliminate an identified over-stocking problem.

Another area of comment is that all leases on the Wilderness should have the stipulation that there will be people hired by the leasee to stay in the area and move the domestic animals to prevent overgrazing of critical habitat for wildlife. | 5

7-5 All grazing permits require management to a degree commensurate with the complexity of the resources involved. In many cases, a rider is required to disperse stock and sometimes to preserve forage for wildlife uses. On some grazing allotments, entire areas are devoted to wildlife uses and domestic stock is kept out either by fencing or by periodic riding of the area. The Plan emphasizes proper range management to protect other noncommodity values.

In conclusion, the area of the plan that really is wrong is the road closures on the Greybull Ranger District and this is the one part I feel the strongest against.

Sincerely,

Leonard M. Bopp

Leonard M. Bopp
Box 194
Meeteetse, Wyoming 82433

cc:

Michael D. Lloyd
Greybull District

Comment 8

Forest Service Response

RECEIVED AUG 6 1985

FPD-8-F-4-C
Proj. No. Orig Typo [illegible]
Aug. 3, 1985

Dear Steve,

It was good to talk with you the other day despite the brevity of the conversation. I'm looking forward to our field trip in September when we can visit more.

In an effort to communicate more about the FORPLAN I would like to elaborate on a few of the problems I touched on in our conversation.

First and foremost, I find it a contradiction to identify the preferred alternative as one with a "noncommodity emphasis." All the figures in the plan show that current levels of commodity production will be met in the preferred alternative, and in some cases, such as timber, the proposed levels are even higher. I appreciate the efforts you have made to extract these commodities in an environmentally sound way; however, those commodity outputs appear to be the emphasis rather than the noncommodity ones. In other words, the preferred alternative sounds great - noncommodity emphasis - until one reads on to see what it would look like on the ground. 1a

8-1a Alternative D does not emphasize commodities, but does keep them near or at present levels. On the vast majority of the Forest, the emphasis is on the noncommodity values.

Specifically, a few of the problems I have with the FORPLAN are:

1. In the DEIS on page II-56, dispersed wilderness recreation visitor days are expected to decrease by 12% below the present 229MRVDs but increase 56% in the next 50 years. Why would the dispersed recreation decrease? We anticipate a gradual but steady increase of the use in wilderness and cannot understand any reason for a decline? Likewise, on page II-55 of the same document, the preferred alternative lists less dispersed and primitive wilderness than alternatives A, B, or C. This is confusing to me, as I would expect Alt. D to list more than Alt. B for example. In fact there are several of these listings in the DEIS charts that seem incongruous with the corresponding alternative. I will send you a complete list of these at a later date. 1

8-1 The section on recreation has been reworded to provide clarity.

2. In the LRMP on page II-50, the plan anticipates an annual average of 13.3 miles of road construction or reconstruction over the next 50 years. On the other hand, in the DEIS on page II-38, the preferred alternative lists 223 miles of road construction or reconstruction. The difference of 665-223=442 miles is significant. Which figure is correct? 2

8-2 In response to numerous concerns, the number of acres managed for timber harvest and the resultant amount of roads has been reduced in the final plan. In the next fifty years, the plan direction calls for only eighty miles of new road construction which will be open to the public. There will be an additional 120 miles of existing road which will be improved, and will remain open to the public. An additional 150 miles of new road, and 255 miles of reconstructed existing roads will be closed to the public within the 50 year period. Road construction and reconstruction figures have been corrected in both documents. See also response to comments 182-5, 44-46, 33-9.

3. The proposal to log 102,000 acres for a total of 12.4mmbf is unacceptable. I have had problems with some of the proposed timber sales to date and to consider increasing them in the future is not what I consider the best use of forest resources. I have discussed this with Tom Bertice briefly and he still claims disease/insect control is one of the major reasons for many of these sales. Unfortunately, history has disproved this in the Upper Wind River drainage where the regeneration appears more diseased in some areas than the original stands. I am disappointed that prescribed burns are not being considered more seriously for disease control, as this method is much more effective than logging. 3

8-3 Timber harvest levels in the Forest Plan have remained approximately at the level of the proposed Forest Plan. The number of acres proposed for treatment has been reduced. This reduction in acreage reflects less emphasis on steeper, less productive areas (primarily stocked with lodgepole pine) and more emphasis on areas with higher productivity. Harvest levels have been established according to the economic viability of individual areas. Forest standards and guidelines are established which will insure that timber sales will not have adverse effects on wildlife, recreation, water, scenic beauty or other resources. See also response to comment 41-13.

4. Although grazing capacity is expected to increase by 33% above current permit numbers, nothing I could find told whether the permits for livestock would be increased during the next 50 years to use that additional forage or if it would be left for wildlife. 4

8-4 The forage would be allocated to both unless there is a change in Wyoming Game and Fish population objectives or Range Allotment Management Plans.

5. I applaud your efforts to meet all Wyo. Game and Fish wildlife population targets except for the North Fork, but I haven't found out why that population is to be reduced by 37%. With the increase in AUMs in the next five decades, are the population quotas for wildlife to increase? Increased recreation and hunting will put more of a demand on the wildlife numbers that exist presently; will the supply be allowed 5

8-5 Population will not be reduced by 37 percent. The Forest only has capacity to provide 63 percent of Wyoming Game and Fish population objective on Shoshone National Forest given the percentage of the total population the Game and Fish assigned the Forest. The present population is at or exceeds Game and Fish objectives; however, a large percentage is on private land.

*The decline in dispersed wilderness MRVDs is contradicted by the figures on page III-33 DEIS that shows a slight increase in dispersed levels in most wilderness use.

VI-41

Comment 8

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to increase commensurately? Also, I am unclear about why I couldn't find consumptive use trend (demand) data for wildlife forage and habitat improvement in the FORPLAN in the LRMP on page II-20. 5

6. In the DEIS on page II-60/61, I noticed that the preferred alternative is much less than the regional objectives for wildlife habitat improvements but more for timber sales. This is very puzzling since it is often thrown back at us that the regional objectives are what made the commodity outputs so high, but here in black and white just the opposite is shown. As I mentioned to you on the phone, I don't see any need for the current level of timber harvest on the forest, much less the 10% increase. With LP on their last nine months of logs, it will surprise me if they are still here at this time next year. Without them, there is only Darwin Wilson in operation unless others start up between now and then. I just don't anticipate the demand for even 10 million board feet and for the benefit of recreation and wildlife, I would just as soon see the trees stay where they are.* 6

7. Speaking of economics, I am somewhat dubious of the figures on page II-75 of the DEIS listing lower population and income statistics in Alternatives C and D in Park and Fremont Counties while the unemployment rate for Alternatives B,C, and D are essentially the same but lower in Park County under Alternative C. I have tried to get the figures about timber contributions to this county, but have been unsuccessful so far. However, I really doubt that the logging industry could affect the figures that dramatically. 7

8. I honestly appreciate the efforts you have made to increase the stipulations for oil and gas leasing. That's a real step in the right direction. I would like to take one more step and establish the criteria for where leasing should be denied. Situation I grizzly habitat is a good place to start. There should be no leasing in Situation I grizzly habitat, period. Habitat should be monitored to make sure that habitat use changes by the grizzly bears are not conflicting with other uses. If so, the Greater Yellowstone Grizzly policy guidelines state the grizzly shall be the priority in Situation I. Grizzly bear recovery is a major goal for us all, yourself included, and I cannot see oil/gas wells in their habitat (like the North Fork) contributing to that recovery. If they recover with that kind of activity, it will be in spite of it not because of it. 8

Once again, I can appreciate the tremendous amount of labor and money that went into producing such an inventory and management plan. I hope that we can reach an amiable solution to our differences, but the only way to go now is down. That means decreasing the commodity output on this forest. In an area such as this, multiple use management seems like a stone age tool that can only contribute to the destruction of the Greater Yellowstone Ecosystem. Let me know if you have any suggestions for trying to work together on this.

Sincerely,
Meredith
Meredith Taylor

* I was particularly disappointed to see the 7E prescription for both sides of the Dunoir Valley and a proposed link road from Brent Creek to the Dunoir. I consider both the road + the proposed logging unnecessary and would like to see these proposals changed. 9

Forest Service Response

8-6 The RPA habitat improvement targets were expressed in acre equivalents. Forest Plan acres are expressed in direct acres affected. Acreage equivalants varies from one treated to one acre improvement, to one acre treated to 640 acre improvement; therefore, the disparity between the figures. The Plan provides for a significant amount of habitat improvement over current management. See also response to comment 105-1.

8-7 Employment/unemployment effects of an alternative are based on the total mix of goods and services being produced by that alternative and the economic structure of the affected areas. Production mixes of goods and services vary by economic impact area as do their economic structures. Therefore, it is not surprising that the relative impacts of alternatives would be different between economic impact areas.

In the case of the southern economic impact area represented by Fremont County, Alternatives A and C have approximately the same effects on unemployment. Major differences between these two alternatives is that A produces more commodities and has less emphasis on high quality, low density dispersed recreation. In this case, the increased recreation in alternative C compensates for the loss in production of commodities in terms of effects on unemployment. The same type of relationship exists between alternative B and D. In other words, the decrease in production of commodities represented in D is compensated for through increased recreation, particularly in developed, motorized recreation and outfitters and guides. Both of these alternatives provide for more impact on unemployment than either alternatives A or C. Reasons for this are that B produces more commodities than A while alternative D produces both more developed recreation and higher commodity outputs than C. Commodities and developed recreation provide more economic impact on local communities than dispersed, nonmotorized recreation.

The same trends are responsible for the relative impacts of these 4 alternatives on the northern economic impact area. In this case, though, the economic structure of this area when combined with the mixes of goods and services produced do not allow for recreation in and of itself to compensate for loss of jobs associated with decreased commodity production.

8-8 U. S. Fish and Wildlife Service has determined that leasing with no-surface-occupancy on a one-half mile corridor will not result in jeopardizing grizzly bears.

8-9 In the 1984 Wyoming Wilderness Act, Congress directed that nonselected roadless areas be released for multiple use purposes, and that "buffer areas" were not to be considered adjacent to wilderness. With this in mind, the Wolf Creek timber sale has been included in the Forest Plan. Planned sales between Five Mile Creek and the Dunoir Special Management Unit have not been included in the Forest Plan; this has been allocated to Management Area 3A rather than Management Area 7E. No logging or road building will take place in the Dunoir Special Management Unit. See also response to comment 44-46.

Comment 9

RECEIVED AUG 9 1985

FPD-9-0-4-C
Proj. No. Orig Type Affil

P.O. Box 56
Cheney, Washington 99004
August 4, 1985

Stephen P. Mealy,
Forest Supervisor
Shoshone National Forest
P.O. Box 2140
Cody, Wyoming 82414

RE: Comments on proposed Forest Plan

Dear Supervisor:

Please add this letter to the record of comments received on the proposed Plan for the Shoshone National Forest. I am a former resident of the Big Horn Basin and still return to the area every summer for at least one backpacking trip in the Washakie Wilderness. In addition to being quite familiar with the Shoshone and its locale, I have 11 years experience as a professional planner. Hopefully my background of local knowledge and professional understanding will make these comments of some use to you.

First, let me commend you and your planning team for presenting a preferred alternative that does not emphasize maximum production of commodities. I have reviewed several forest plans and was beginning to fear that the entire U.S.F.S. had acceded to the Reagan administration program to destroy the American environment. And my own experience in planning in the Big Horn Basin, confirms the logic of attempting to minimize conflict by providing for the reasonable continuation of traditional forest uses such as grazing and outfitting, while placing stringent controls on timbering and minerals activity. Your use of an explicit methodology to analyze potential social conflicts is also to be commended.

I generally support your preferred alternative "D", but have a a number of comments about specific aspects of the Plan. First, though I must say that the Plan (even though I agree with it in general) does leave a lot to be desired as an instrument of communication with the general public. It is nearly impenetrable to the average forest user, and the summary omits many details that are critical to the overall concept.

My specific comments follow.

1. There is a small area, just north of the wilderness boundary on the Elk Fork for which the Plan proposes prescription 2A, permitting some motorized recreational use. Given the area's small size (it appears to be 300-400 acres) and its position between a managed wildlife habitat area and the wilderness, I believe that prescription 3a would be more appropriate. 1

Forest Service Response

9-1 The Forest Plan shows no extensive timber sales in the Blackwater Creek and Green Creek area. During the first decade the District plans to sell approximately 200 MBF of small Ranger Sales District-wide consisting of post and poles, fuelwood, thinning, house logs, salvage and personal use Christmas trees. The sales in the Blackwater and Green Creek areas will utilize the existing road systems and skid trails. No road construction is anticipated in the first decade.

The area was proposed as 2A to provide access to the Wilderness boundary rather than closing the road one mile away during the summer months. The reader correctly points out the importance of the 5A area for elk management with its seasonal restrictions of vehicular use. There is and will continue to be closures to snowmobiles and other vehicles during the fall-winter-spring season up the entire Elk Fork drainage. Therefore to provide summer access, the area will need to remain 2A, but snowmobiling will not be permitted.

Comment 9

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2. The comment above also applies to the Kirwin "corridor" along the North Fork of the Wood River. I know the road is there -- it makes a great trail. But I don't believe that management emphasizing motorized access to this area is compatible with the surrounding wilderness and wildlife values. **2**

3. The Plan contemplates right-of-way acquisition on the Grass Creek, Raspberry, and Rock Creek roads. But no cost of acquisition appears (at least I couldn't find it). And in the absence of a way to compare the costs and benefits of acquiring these fairly remote rights-of-way, I am unwilling to accept an assumption that acquisition is necessary. My own observation is that the areas "guarded" by limited access along these roads are among the most desirable in the Forest for someone who is seeking solitude. I have used the Rock Creek road for access to the Washakie Needles, but I'd rather walk in from the Wood River than have the Forest Service take any action that increases use in the area. The animals and truly reclusive backpackers need someplace to hide. **3**

4. The Appendix describing stipulations on minerals activity is not as clear as it might be. The term "high amenity values" in the Appendix does not appear in the "Forest Plan Detail", making it difficult to figure out what stipulations or levels of monitoring apply to specific areas. IF high levels of monitoring are proposed only in those areas where high level monitoring is specifically mentioned, I think there's a problem. There are many other fragile areas where oil and gas or any minerals activity would merit strict stipulations and monitoring. **4**

5. I am concerned about the definitions of wilderness user capacity and the balance of management prescriptions in the Washakie. I would like to know the source of the user capacity definitions, so I could assess their basis, because they seem very liberal to me. I think use should be reduced long before anyone sees 19 other parties, even on busy trail segments like the lower South Fork of the Shoshone or the trail into Five Pockets. If I saw 9 other parties in a day, I would be unlikely to return to that trail, even if my ultimate destination was a less crowded area. My suggestions for managing wilderness capacity are:

1. slightly reduce areas mapped as 8C (I have mapped some suggestions for the areas I'm familiar with) - set capacity at no no more than 10 parties per day during summer use season, no more than 20 during hunting season;

2. reduce areas mapped as 8B - set capacity at no more than than 3 parties per day;

3. expand areas mapped as 8A - set capacity at no more than 1 party per day.

These limits have not been exceeded during my own trips in the Washakie (except once on the Elk Fork in '84 when there was an amazing number of people). If use grows, they would require some rationing. No one likes to have their access to the backcountry limited. But I think it would be acceptable if it guaranteed a quality experience and if **5**

2

Forest Service Response

9-2 The Kirwin area on the main fork of the Wood River is managed to provide for semiprimitive, nonmotorized activities. This means that the area is available for snowmobiling in the winter and motorized travel, on the road only, in the spring, summer and fall. Topography and travel regulations prevent travel off the designated route. There is no evidence that motorized travel on the road or associate picnicing and fishing activities have any adverse effect on wildlife populations.

9-3 The needs for rights-of-ways throughout the Forest were carefully evaluated and only those specifically needed for public or administrative access were identified for acquisition. It is not appropriate to use lack of access rights to limit numbers of forest visitors. To do so would limit access to those privileged few who happen to be able to secure permission to cross privately-owned property bordering the Forest. Jurisdiction over roads, be it County, Forest Service, or other entity is determined by the primary use of the road. If a road serves mostly private land, it should probably be under county jurisdiction. If it serves mostly National Forest purposes, it should be maintained by the United States. In some cases, both should share the responsibility. Fees for recreation use must be resolved at a National level.

9-4 Your comment is correct. We have amended Appendix K and Appendix J. The listing of the monitoring practices in each Appendix J entry is related only to scheduled, locateable management activities intended for the first decade of plan implementation. At this point, oil and gas activities are neither locateable nor scheduled. A monitoring plan would be developed for a variety of resource parameters following the environmental analysis for a specific operating plan or lease application. See Chapter IV of the Plan for more specific monitoring requirements. Also the Water Resource Monitoring Plan which is incorporated by reference, keys monitoring requirements to specific land types, land use objectives, and management intensities.

9-5 User capacity definitions are dervived from the Recreation Opportunity Spectrum Users Guide, a USDA Forest Service publication. This system was further refined by wilderness research conducted at Colorado State University and the Rocky Mountain Research Station by Driver, McConnell and Brown. The names applied to the different areas, (semiprimitive, primitive, and pristine) are from the original publication. While these may be confusing, it would cause more confusion to rename them. The definitions are based upon sampling of wilderness users for their preferences and needs for wilderness experiences. While not foolproof and not acceptable to some, these numbers do represent state-of-the-art wilderness research.

Comment 9

FPD - 9 - 0 - L - C
Proj. No. Orig Type Alt

the Forest provided good information about alternative trips for those whose areas of choice were fully occupied. Better rationing than the crowding that has diminished the quality of so many other wild areas. 5

This concludes my specific comments, at least for now (I may get back to the Plan if I have more time before the comment period ends). I hope they will be given serious attention. If you have questions, please feel free to get in touch with me.

I appreciate your efforts in the preparing the Plan, and as I said earlier, it is one of the most reasonable Forest Plans I've reviewed.

Sincerely,

Lee Nellis

Forest Service Response

Some areas now classified as 8B, primitive wilderness, must remain as such because of grazing activities. Grazing inside wilderness is mandated by the 1964 Wilderness Act and subsequent legislation and regulations. Other areas do not qualify as 8A because of traditional user patterns, evidence of human presence, or proximity to trails and other facilities. Existing delineations of 8A, 8B, and 8C management areas are the Forest Service "best guess" at the present time. These delineations can be changed as the need arises.

Existing laws permit the development of valid mineral claims inside wilderness and in some cases this may mean the construction of roads if such are needed for the claimout to reasonably develop his mineral rights.

Comment 10

Forest Service Response

RECEIVED AUG 1 3 1985

FPD - 10 - F - 4 - C
Proj. No. Orig Type Affil

A. MANCHAK, B.S. , M.A.
P.O. Box 1754
Riverton, Wyoming 82501

SHOSHONE NATIONAL FOREST
P.O. Box 2140
225 West Yellowstone Avenue
Cody, Wyoming 82414

August 12, 1985

Dear Gentlemen:

Greetings, the " Forest Plan " described in the letter I received from WYOMING WILDLIFE FEDERATION suggests no NATIONAL PURPOSE as regards the national economy, sociology or Defense. U.S. Congress should learn that. Therefore, the " Forest Plan " should be " scrapped " totally; as should the Immigration schemes of U.S. Senate, which add population pressures on the resources of the United States.

Timber cutting, if needed by the national economy, would be more viable around the low timberlines of the potentially cataclysmic range of volcanic mountains in the states of Washington, Oregon and California. Too, if needed by economic demands, timber cutting can be increased in the Southeast where trees grow faster and have as much economic worth for construction etc.

Destruction of the economy of Wyoming from petroleum drilling would exceed by far the worth of oil finds. If there are oil fields in that area, they have already been tapped or could be tapped from peripheral areas near the Shoshone National Forest.

I have noticed that the big game trails in the mountains and ranches have been blocked off by building sites and activity related to businesses predicated on hunting and fishing. That has been very very counter productive. Once such businesses ruin hunting anf fishing, they turn to plunder, vice and even crime to subsist. Laws should be designed to give those businesses and private owners of cabins in those big game trails to move their building sites out of the way so that the natural habits of big game can be reinstated as regards procreation and survival during severity of Wyoming winters.

1

10-1 Chapter I of the EIS discusses the concept of net public benefits. This concept encompasses "national purposes". The timber harvesting proposed in the Plan has a positive economic return to the nation. Oil and gas production has a positive effect on the Wyoming economy if negative effects on recreation and wildlife are mitigated. Control of developments on private land is not under Forest Service jurisdiction. See also response to comment 115-1.

A. Manchak

Sincerely, A. Manchak, B.S. , M.A.

P. S. Perhaps, you can make a copy of this letter, attach a copy of the Wyoming Wildlife Federation letter and send them to W. S. Sen. Boren of Okla.

Comment 11

Forest Service Response

RECEIVED AUG 1 4 1985

FPD - 11 - F - L - B
Proj. No. Orig Type Affil

PETROLEUM AND MINING
EXPLORATION & EVALUATION
SURFACE & SUBSURFACE

JAMES G. OSBORNE, JR., C.P.G.
GEOLOGICAL CONSULTANT
525 CLIFF ST.
LANDER, WYOMING 82520
DIAL (307) 332-4525

13 August 1985

Supervisor
Shoshone National Forest
P.O. Box 2140
Cody, Wyoming 82414

Dear Supervisor

I am writing to you concerning a flyer that the Wyoming Wildlife Federation sent to me. They and others are advocating that less money be spent on timbering, cutting back on roads in roadless areas, limiting of motorized vehicles, and withdrawal of some recreational areas from O&G leasing; all of this in the Shoshone National Forest.

I am enclosing a copy of this flyer along with clippings from the Riverton Ranger and particularly Bob Peck's editorial. Though Bob's article deals with Yellowstone the same rationale certainly is applicable to the National Forest, and to all public lands in Wyoming. I have made several trips to Denver in the past 30 days to speak with major oil company directors and they all voiced concern about the activist environmentalists and the power they yield in Wyoming. They are adept at reducing the few job opportunities that we have in our state and at the same time strapping our national security by making us even more dependant on foriegn hydrocarbon.

Needless to say, I am diametricly opposed to the Wyoming Wildlife Federation's proposals and urge you to also oppose them. I am REALLY worried about Wyoming's future. We have enough "play" areas, maybe too many, it is my opinion that we need to pursue a prudent course of multiple use of our public land and not leave it's use to a chosen few. Another thing to consider, and that is that tourism is a faddish and fickle thing subject to the cost of travel. 1

Your serious thought to this matter will indeed be appreciated.

Respectfully submitted,

James G. Osborne, Jr.
CPG, CPGS

DISTR: Gov. Ed Herschler
Sen. Alan Simpson
Sen. Malcolm Wallop
Rep. Dick Cheney
Shoshone Nat. For. Supervisor

ENCL: 3

11-1 See response to comment 68-5.

Comment 12

RECEIVED AUG 1985

FPD- 12- F- 6- B
Proj. No Orig. Type

OUTFITTERS

GARY RICE
(307) 455-2210

P.O. Box 284
Dubois, Wyoming 82513

August 6, 1985

Shoshone National Forest
Stephen P. Mealey, Forest Supervisor
P.O. Box 2140
Cody, Wyoming 82414

Dear Mr. Mealey,

I'm writing in response to the Shoshone National Forest Proposed Plan. The Forest Service is proposing Alternative D, which I feel can not be implemented because this alternative tries to be everything to everyone and that's impossible to do, recreation and logging are not compatible.

ROADS: There are already 1440 miles of open roads in the forest today, the need to construct or reconstruct 665 miles more miles in the next fifty years is insane. There are reams of study data that show roading causes hardship and reduction on wildlife, both big game and small. All of the proposed roads in the Wind River District for the next ten years (16 roads--34.6 miles) are designed for the purpose of logging and have little if any value to the public as far as access for recreational purpose. Several of the new roads are in crucial wildlife habitat, therefore, I recommend that there should be a strong reduction in the amount of road construction that is being proposed. 1

TIMBER: As a tax payer, I'm fed up with subsidizing the logging industry. I feel that if the forest service is going to butcher the forest, the logging industry should pay it's own way. There are several statements in the proposed plan that I feel are totaly out of line. On page II-51, it states that there is aesthetic beauty in pattern of vegetation that includes ages and sizes of trees. I know of no one, not even a logger, that can say a cut block is beautiful. Our National Forest are being treated as if it it is farm ground with strip rotation of timber harvest, this viewed from a distant or from the air has little or no aesthetic value. It creates a totaly unnatural state. 2

There are several timber sales that I'm opposed to: 3

WOLF CREEK--T43N, R106W, S5, 6, 7 A.A. #181, Dunior--to much timber removal in a short time periond.

Forest Service Response

12-1 In response to numerous concerns, the number of acres managed for timber harvest and the resultant amount of roads has been reduced in the final plan. In the next fifty years, the plan direction calls for only eighty miles of new road construction which will be open to the public. There will be an additional 120 miles of existing road which will be improved, and will remain open to the public. An additional 150 miles of new road, and 255 miles of reconstructed existing roads will be closed to the public within the 50 year period. Road construction and reconstruction figures have been corrected in both documents. See also response to comments 182-5, 44-46, 33-9.

12-2 The historical record of timber harvest shows that offerings of timber on the Shoshone National Forest have not subsidized the logging industry. The statement referred to is a general one based on extensive sampling of people who viewed different photographs of scenery and rated each one. The photographs with more diverse vegetation including different ages and sizes of trees were consistently rated better aesthetically. Whether or not vegetation management is pleasing to the eye is highly dependent on the standards guiding implementation of the activity. The Forest Plan includes standards for visual management which vary according to the importance of particular areas for recreation.

Comment 12

Forest Service Response

FPD - 12 - F - L - 8
Proj. Nbr Orig Typo Appl

page 2

GAP LAKE--T43N, R108W, S17 A.A. #181 Dunoir--this sale of 1602 MBF is to large for a single cut block.

CAMP CREEK-- T42N, R109W, S8, 16 A.A. #181 Warm Springs--this sale of 2920 MBF is to much volume for this area at one time. Elk and deer populations in this area are down at this time.

RAMSHORN--T43N, R108W, S19 A.A. #184 Parque Ramshorn--
HORSE CREEK--T43N, R107W, S21, 28 A.A. #184 Parque Ramshorn--
BRENT CREEK--T43N, R107W, S23, 25 A.A. #184 Parque Ramshorn--
these three sales should not be let at all. This area already has been over harvested and there is to much open area already. The need for wildlife cover, at this time, out weights the value of this timber. 3

SIX MILE-- T43N, R108W, S1, 12 A.A. #184 Parque Ramshorn--
this sale ia a definite NO. The amount of road construction and reconstruction into this area is totaly out of line with the volume of timber to be harvested. The new road and the location of the timber sale would open up unneeded access into a very narrow elk migration corridor. This timber sale could charge the migration pattern of this elk herd and could result in as much as 50% herd reduction.

OIL-GAS and MINERALS: There should be no mineral leasing on or near the national forest. This country right now has an oil glut, very little coal market, and the steel industry is practically at a stand still. To allow oil and gas exploration at this time is ludicrous. You show in your tables in the forest plan that you expect a large increase in recreation, if, this is true, the demand for forest that has an aesthetic value, clean water, and a stable wildlife population, will have a much higher priority than letting leases for mineral exploration which is not need at this time. 4

GRAZING: I do not favor cattle or sheep grazing within the Wilderness Areas. I feel that wilderness areas were set aside for recreation and preservation in a natural state. There are many abuses of livestock grazing permits on the Shoshone National Forest. Over grazing is one of the most common, along with the salting practices. There are, however, responsible ranchers in our area that do a very good job keeping their cattle well disbursed and looked after, while others could care less. I feel that it's the forest services fault that we have misuse of grazing permits, therefore, I recommend that the Wind River District take a case by case look at each grazing permit and get the problem under control as soon as possible or elimate cattle grazing in the Wind River District altogether. 5

12-3 Timber harvest levels in the Forest Plan have remained approximately at the level of the proposed Forest Plan. The number of acres proposed for treatment has been reduced. This reduction in acreage reflects less emphasis on steeper, less productive areas (primarily stocked with lodgepole pine) and more emphasis on areas with higher productivity. Harvest levels have been established according to the economic viability of individual areas. Forest standards and guidelines are established which will insure that timber sales will not have adverse effects on wildlife, recreation, water, scenic beauty or other resources. The sales mentioned remain in the Plan.

12-4 The General Mining Laws guide what can or cannot be withdrawn from mineral entry and under what conditions. We direct your attention specifically to Plan, Chapter III in the blue pages under Mining Law Compliance and Administration (General Direction 1C and 2) and Minerals Management Oil and Gas and Geothermal (General Direction 1). All direction found under Minerals Management, supplemented by Plan Appendix K, is intended to protect existing and proposed uses of the land for other resources thereby avoiding the need for withdrawal. If exceptional situations arise, or existing direction is shown to be insufficient, the option of withdrawal remains.

Mineral operations are by law, a viable use of public land. Our charter, provided by Congressional action, is to manage first according to law, and not strictly according to variable market pressures. The mining laws stipulate that lease applications can be made and must be considered for lands not withdrawn. The Forest Plan was selected in large part because it allows mineral activities while recognizing and maintaining the values of clean water, stable wildlife populations, and recreation opportunities which are of primary importance to many Forest users. The Forest Plan affords adequate protection of popular recreation areas, critical wildlife habitat, and other such resource values through application of stipulations and recommended operating procedures. Protection may be in the form of seasonal restrictions or no-surface-occupancy stipulations (see Appendix K of the Plan).

One consideration here is that a lease may never result in actual drilling activity; historically, a low percentage of leases are explored or developed, due in part to market fluctuations and uncertainties.

12-5 The Wilderness Acts provide for continued grazing. Abuses of grazing permits will not be tolerated as stated in the prescriptions and standards for use.

Comment 12

Forest Service Response

FSD-12-E-4-13
Proj. No. Orig Typo Final

page 3

NEW OUTFITTER CAMP PERMINT: In the proposed forest plan for the Wind River District, there are seven new outfitter camp permits available. Of these seven camp locations, there are only two that might be considered as an operation. The permit in the Wind River area might be considered but would be very marginal. The Wiggins Fork permit as a very low volume operation. The other permit areas that are purposed are in direct conflict with already established Outfitter camps or with high volume public use. There seems to be enough already established camps to handle the public needs for hunting in the Wind River District, to add more commerical camps, at this time, could place an economic burden on current operating outfitters. Many of the proposed camps would not make sound opeartions and therefore, I feel that these new permits would only be used for the first permitee to make a quick sale to an unsupecting party to make a fast buck and leaving the second party holding a permit that is of little use as an outfitting business.

6

Thank you for your time.

Sincerely,

Gary J. Rice

cc: Senator Simpson
Senator Wallop
Rep. Dick Cheney
Thomas J. Portice

12-6 The public response to the proposed new outfitter/guide camps has been overwhelmingly negative. Therefore, no new outfitter/guide camps are allocated in the Forest Plan.

Comment 13

Forest Service Response

RECEIVED AUG 2 2 1985

FPD - 13 - 0 - L - C
Proj. No. Orig Type Attn

Mark Pearson
P.O. Box 204
Grand Junction, CO 81502

August 18, 1985

Forest Supervisor
Shoshone National Forest
225 West Yellowstone Ave.
P.O. Box 2140
Cody, WY 82414

Dear Sir:

I am writing to comment on the proposed Forest Plan for the Shoshone National Forest.

I support the general priniciples of the Preferred Alternative, i.e., an emphasis on noncommodity values such as recreation, wildlife, and visual resource needs. This emphasis recognizes the most important resources of the Shoshone National Forest. However, I do have some comments disagreeing with specific management prescription areas proposed in this alternative.

I strongly support continued management of the Clark's Fork river corridor in a manner compatible with future Wild and Scenic River designation. This river canyon is one of the premier features of the entire forest. 1

I am deeply opposed to the 2A management prescription accorded to Elk Creek in the Basin analysis area. The plan accords 3A status to the hillsides of the Elk Creek drainage while leaving the valley bottom itself open to an incompatible form of managment, i.e., ORV use. Elk Creek was recommended by the Forest Service for wilderness designation in RARE II. Notwithstanding Congress's failure to designate the drainage as an addition to the North Absaroka Wilderness, why has the Forest changed its management direction for Elk Creek? Surely primitive recreation opportunities and maintenance of natural values is more important now than it was in 1979. What are the imparts of encouraging motorized use in Elk Creek on the grizzly? Is this Situation 1 or Situation II grizzly country? The Forest should also realize that the Elk Creek trail, in conjunction with the Dead Indian Creek trail, provides one of the very few short loop trails that a typical backpacker can traverse in a weekend. Now the weekend hiker will be met by the noise and smell of ORVs on this formerly pleasant trail. The Elk Creek trail corridor should receive a 3A management prescription. 2

I support the 3A prescription for the Pilot Creek-Squaw Creek strip along the upper Clark's Fork. However, how does the Forest plan to access its proposed vegetative management zones (timber sales?) along the wilderness boundary on Pilot Creek and near Squaw Peak? Will these be temporary roads which are then closed to the public? 3

13-1 The Proposed Plan incorrectly states that we can apply for an extension of the protection period for the River. It is contingent upon an act of Congress to protect the River either by including it in the Wild and Scenic River System or by providing additional temporary protection. It is uncertain at this point whether the Clarks Fork of the Yellowstone River will become a part of the National Wild and Scenic Rivers system. The Forest Service and the Administration are in favor of the River's inclusion. Management activities that are within the discretion of the Forest Service will be designed to maintain the River's eligibility. Other activities that are presently within the discretion of agencies such as BLM (minerals) or Federal Energy Regulatory Commission (hydropower development) could affect eligibility characteristics of the Clarks Fork. In the event such developments are proposed, we would recommend denial to the appropriate agency, until Congress acts. See also response to comment 97-1a.

13-2 The area is grizzly bear Management Situation II. This area was not recommended for wilderness designation in RARE II. The area is and has been open to motorized use of trails. Although the area receives little use of this kind, it is one of the few opportunities for this type of recreation on the District.

Comment 13

FPD - 13 - 0 - L - C
Proj. No. Orig Type Affil

I also support the 3A prescriptionr accorded to Sunlight Basin. This is one of the more spectacular areas of the Forest and its recreational values should be the primary resource. **3**

I am disturbed by several of your proposals along the North Fork. In particular, the extensive timber sales planned for Blackwater Creek and the Blackwater Natural Bridge Trail will wreak havoc on the wonderful pristineness of those valleys. It appears that timber harvest is planned only for the valley bottoms, which makes sense given the paucity of revegetation on the surrounding higher slopes since the Blackwater Fire, but won't this lead to potentially severe water quality impacts due to skidding, road cutting, and general soil disruption on the banks of the streams? Isn't this also in critical grizzly habitat? This beautiful, lush valley should be accorded 3A prescriptions in its entirety. **4**

I would be opposed to any plans for additional telecommunciations towers on Clayton Mountain. Just several years ago the Forest was intending to remove the clutter atop the mountain from previous transmitter sites, fire towers or whatever was up there. It seems particularly inappropriate to locate telecommunciations towers smack dab on the boundary of a wilderness, particularly when they will be visible for many miles within the wilderness (from the entire Elk Fork drainage). The Forest definitely needs to limit the construction of any additional transmitters at this site. **5**

I don't think the Forest has done a very good job in drawing its wilderness management prescription areas. It appears as if you are simply zoning the wilderness without consideration for the situation on the ground. For example, you designate trails as 8C, which may be appropriate, but then everything adjacent to trails is 8B, and the pristine zones, 8A, are all at least a mile or two removed from the 8C corridors. It does not logically follow that extensive expanses of trailless drainages coming in to the main creeks (the 8C corridors) are all not pristine. To the contrary, from my experience, the vast majority of these trailless side drainages are pristine beginning a few feet off of the main trail. The Forest should reallocate the vast acreages of 8B prescriptions between trail corridors to the pristine 8A prescription, particularly where there are substantial trailless drainages, such as along the South Fork Trail, between Ishawooa Creek and Deer Creek, off of the Fishhawk and Elk Fork Trails, and throughout much of the heart of the North Absaroka Wilderness. **6**

One aspect of the Forest Plan which I have not seen in any other plans is Appendix J - Forest Plan Detail. This was a substantial help in deciphering some of the specifics of the plan. The Shoshone Forest is to be commended for developing it.

Thank you for the opportunity to comment.

Sincerely,

Mark Pearson

Mark Pearson

Forest Service Response

13-3 The roads will be single purpose roads for removal of timber and then closed to public use following timber activities.

13-4 The Forest Plan shows no extensive timber sales in the Blackwater Creek and Green Creek area. During the first decade the District plans to sell approximately 200 MBF of small Ranger Sales District-wide consisting of post and poles, fuelwood, thinning, house logs, salvage and personal use Christmas trees. The sales in the Blackwater and Green Creek areas will utilize the existing road systems and skid trails. No road construction is anticipated in the first decade. These areas are in grizzly bear Management Situation 2.

13-5 Visual quality objectives for nonwilderness lands are established based on recreation needs and resource objectives for all surrounding lands. Projects in all areas of the Forest are designed to attempt to achieve designated visual quality objectives.

13-6 User capacity definitions are dervived from the Recreation Opportunity Spectrum Users Guide, a USDA Forest Service publication. This system was further refined by wilderness research conducted at Colorado State University and the Rocky Mountain Research Station by Driver, McConnell and Brown. The names applied to the different areas, (semiprimitive, primitive, and pristine) are from the original publication. While these may be confusing, it would cause more confusion to rename them. The definitions are based upon sampling of wilderness users for their preferences and needs for wilderness experiences. While not foolproof and not acceptable to some, these numbers do represent state-of-the-art wilderness research.

Some areas now classified as 8B, primitive wilderness, must remain as such because of grazing activities. Grazing inside wilderness is mandated by the 1964 Wilderness Act and subsequent legislation and regulations. Other areas do not qualify as 8A because of traditional user patterns, evidence of human presence, or proximity to trails and other facilities. Existing delineations of 8A, 8B, and 8C management areas are the Forest Service "best guess" at the present time. These delineations can be changed as the need arises.

Existing laws permit the development of valid mineral claims inside wilderness and in some cases this may mean the construction of roads if such are needed for the claimout to reasonably develop his mineral rights.

EPD - 14 - 0 - 1 - C
Proj. No. Orig Type

RECEIVED AUG 23 1985

Glenn Compton
5808 Nutmeg Ave.
Sarasota, Florida 33581

Stephen P. Mealey
Shoshone National Forest
P.O. Box 2140
225 W. Yellowstone Ave.
Cody, Wyoming 82414

Dear Mr. Mealey:

Concerning the Draft Environmental Impact Statement and the Proposed Forest Plan, my opinion is as follows: if the Forest Service is to continue to protect America's natural resources, certain needs must be addressed:

1. Below cost logging should not be allowed. — 3
2. No further degradation of the fisheries of the Shoshone National Forest should not be allowed. — 4
3. Development should not be allowed in critical big game habitat. — 5
4. Grazing of livestock should not degrade areas critical to wildlife and fisheries. — 6
5. The Forest Service should manage the Shoshone National Forest ecosystem with the ecosystem concept in mind and with wildlife, and scenery a high priority. — 1
6. Estabilish systems to monitor changes in the Forest, and make regular reports to the threats of the resources, along with long term plans to deal with them — 8
7. Increase natural scientific research in the Forest. — 9
8. Acquire more land into the Forest. — 10
9. Preservation and conservation of natural resources should be a top priority.
10. The Forest should be managed in such a way as to emphasize wildlife habitat, improve watershed conditions, protect and preserve physical and biological characteristics of the Forest, improve water quality, fisheries, wildlife habitat, and visual quality. — 1

Therefore, in my opinion, the preferred Alternative D is inadequate for the future management of the Shoshone National Forest. Alternative B is the more preferred Alternative. — 2

Yours truly,

Glenn Compton

August 17, 1985

14-1 All of the items are addressed in the FEIS and Plan. The Plan emphasizes precisely those items the respondent is concerned with. The ecosystem has been subdivided into 109 analysis areas and then aggregated up to form the forest Plan as suggested in item 5.

14-2 Based on respondent's concerns, we fail to understand his selection of Alternative B (the commodity emphasis alternative) as the preferred.

14-3 Timber sales selected through the forest planning process have been selected to maximize present net value. Data is based on historic selling value and experienced costs. It is anticipated that future sales will not be "below cost" sales according to present knowledge of selling values and costs. Wildlife and recreation values have not been included in the calculations of PNV for the purposes of selecting sales for harvest.

14-4 One objective of the Forest Plan and the monitoring activities associated with it is to maintain or improve fish habitat on the Forest. Standards and guidelines for management activities such as road construction, timber harvest and oil and gas exploration are designed to protect water quality and fish habitat.

14-5 Developments not compatible with crucial big game winter range will not be allowed.

14-6 See Standards and Guidelines in General and Forest Direction in Chapter III of the Plan.

14-8 We refer you to Chapter IV of the Plan. We feel the system is established for periodic and frequent review of the Plan, its implementation, and the resources which are affected.

14-9 Two of five areas proposed for designation as Research Natural Areas (Twin Lakes and Sawtooth) in the preferred alternative were proposed in the Beartooth Plateau Unit Plan, completed on November 26, 1980. Work necessary for designation has been underway for some time. Other RNA's may be designated in the future after the five priority areas identified in the Plan are established.

The Sawtooth peat beds area is considered unique because of its location; it is the only known area of permafrost with a peat deposit this far south in the Rocky Mountains. "Unique ecosystem" has been changed to "unique landform" on page II-85 of the Forest Plan.

We continue to work toward improving the biological inventory of forest resources, and always welcome accurate information supplied by others to help us develop this.

14-10 The Forest Service cannot purchase lands outside the National Forest boundary without Congressional approval.

Comment 15

RECE

FPD - 15 P L B
Proj. No. Orig Type Affil

RICHARD D. ANDERSON, M.D., P.C.
DIPLOMATE OF AMERICAN BOARD OF INTERNAL MEDICINE
MEDICAL CENTER BUILDING, SUITE 280
721 SHERIDAN AVENUE
CODY, WYOMING 82414
TELEPHONE 527-6415

8-28-85

Shoshone National Forest
PO Box 2140 225 West Yellowstone Ave.
Cody, Wyoming 82414

Dear Ladies and Gentlemen:

I would like to comment on the draft Shoshone National Forest Plan. I believe that the proposed plan over-emphasizes timber harvesting and road building at the expense of wildlife and recreation. 1

I believe that less money should be spent on timbering and that the annual timber harvest be reduced. Less timber money would preserve visual quality, create more reactional opportunities, and reduce soil erosion and water pollution. Clear cutting would be detrimental to many non-game species and timber roads would disrupt elk herds. 2

I believe that the Forest Service should cut back road construction in the currently roadless areas. The forest already has over 1,440 miles of road - more than enough to meet the needs of the public. 3

I would like the Forest Service to designate as Non-Motorized Recreational Management areas around the Bear Tooths, North Absaroka, Fitzpatrick and adjacent to Yellowstone National Park. These areas should be designated as 3B not the currently proposed 3A which would allow for road building and timbering. 4

In addition, I believe that the Forest Service should withdraw popular recreational areas and critical wildlife habitat from oil and gas leasing. 5

Thank you for your attention on this matter.

Sincerely,

Richard Anderson M.D.

Richard D. Anderson, MD

RDA/lr

Forest Service Response

15-1 With only four percent of the entire Forest being managed for commercial timber harvesting over the planning horizon, it is difficult to understand how the Plan "over-emphasizes" timber harvesting and road building. Wildlife is protected by stringent standards and guidelines for all activities as well as by road closures when and where needed. Those roads remaining open provide increased motorized recreational use.

15-2 Vegetation diversity is important in enhancing visual quality. Nonmanagement of timbered areas often results in lowered visual quality as stands die or are killed by insects and disease. A healthy managed forest is considered to be more visually pleasing than a dead, dying, or diseased one. Less money for timbering would not preserve existing visual quality, would result in less motorized recreation and does not create more dispersed nonmotorized recreation but would simply maintain what presently exists. Soil and water protection are provided for through standards and guidelines for all planned activities. Most wildlife species are dependent upon more than on vegetational successional stage (both game and nongame species). Creating openings through clear cutting favors those species dependent upon early successional stages. Old growth dependent species have more than enough habitat on the Forest. Roads do not disrupt elk, vehicular use of roads do. This is the reason for the seasonal or yearlong closures of the roads built for timber harvesting.

15-3 In response to numerous concerns, the number of acres managed for timber harvest and the resultant amount of roads has been reduced in the final Plan. In the next fifty years, the Plan projects only eighty miles of new road which will be open to the public. There is projected 120 miles of existing road which will be improved and remain open to the public. An additional 150 miles of new road, and 255 miles of reconstructed existing roads are projected to be closed to the public within the 50 year period. Road construction and reconstruction figures have been corrected. See also response to comments 182-5, 33-9, 80-5, and 44-46.

The Forest Plan will guide management over the next 10 to 15 years and will be revised every 15 years or sooner in response to major changes in information or needs of the American public. Projections over 50 years are provided to portray long term consequences only.

Comment 15

Forest Service Response

15-4 The Shoshone National Forest is 57 percent wilderness. The Wyoming Wilderness Act of 1984 specifically mentions release of lands not designated as wilderness for multiple use, specifically condemns the concept of nonwilderness buffers around designated wilderness, and states that lands not designated as wilderness need not be managed to preserve wilderness character. Many of the nonwilderness areas are protected from development because of being critical for wildlife, unproductive for wood fiber production, or critical for visual corridors. Regardless of entry into a few of the many remaining roadless areas, the Forest will remain overwhelmingly unroaded and more or less undeveloped. Our charter is to manage for multiple-use, not just preservation.

The uses of the Forest other than preservation and nonmotorized recreation, such as wood fiber production, domestic livestock production, oil and gas development, developed recreation, and motorized recreation, have been provided for to the extent possible given a stewardship objective. The Forest Service feels that these more commodity-oriented uses have been provided for in balance with the noncommodity uses in the preferred alternative.

15-5 The General Mining Laws guide what can or cannot be withdrawn from mineral entry and under what conditions. We direct your attention specifically to Plan, Chapter III in the blue pages under Mining Law Compliance and Administration (General Direction 1C and 2) and Minerals Management Oil and Gas and Geothermal (General Direction 1). All direction found under Minerals Management, supplemented by Plan Appendix K, is intended to protect existing and proposed uses of the land for other resources thereby avoiding the need for withdrawal. If exceptional situations arise, or existing direction is shown to be insufficient, the option of withdrawal remains.

Mineral operations are by law, a viable use of public land. Our charter, provided by Congressional action, is to manage first according to law, and not strictly according to variable market pressures. The mining laws stipulate that lease applications can be made and must be considered for lands not withdrawn. The Forest Plan was selected in large part because it allows mineral activities while recognizing and maintaining the values of clean water, stable wildlife populations, and recreation opportunities which are of primary importance to many Forest users. The Forest Plan affords adequate protection of popular recreation areas, critical wildlife habitat, and other such resource values through application of stipulations and recommended operating procedures. Protection may be in the form of seasonal restrictions or no-surface-occupancy stipulations (see Appendix K of the Plan).

One consideration here is that a lease may never result in actual drilling activity; historically, a low percentage of leases are explored or developed, due in part to market fluctuations and uncertainties.

Comment 16

Forest Service Response

RECEIVED SEP 5 1985

FPD-16-W-L-C
Proj. No. Orig Type Affil

August 30, 1985

Dear Forest Service Personnel,

I would like to comment upon the draft Shoshone National Forest Plan. My strongest negative reaction to the draft was to the strong emphasis placed upon timbering in the plan. It is my opinion that timbering is a poor use of this forest. "Taking the Rocky Mountain forest as a whole, high mountain recreation, forage for sheep and cattle, and water production for domestic and municipal use and for irrigation are the most important uses of the forest" (Jay Heinrichs, Journal of Forestry, 1983). The Rockies are not a timber producer. Only 6% of the U.S. timber crop comes from forests in the Rocky Mountains. The main reason? The quality of the timber relative to the costs of harvest and marketing. According to R.C. Hammond, the former (X6 1985) Chief Forester at the Lander Office of the Forest Service, "For a good lumber crop in the Northern Rockies you need a high density of big trees on level ground at a lower elevation (6000-8500 ft). The Targhee Forest is an example of a producing forest. The Shoshone is not. The trees are small, the ground is irregular with much sloping, and the elevations of most of the proposed cuts are over 8500 ft. The quality of the timber is so low that the sales often don't pay for the management of the sales and for the next timber crop. Who is on welfare here? Lousiana Pacific? Let's have a little free market enterprise. Why grind up our forests to subsidize a failing business? Occasional

1

16-1 Timber harvest levels in the Forest Plan have remained approximately at the level of the proposed Forest Plan. The number of acres proposed for treatment has been reduced. This reduction in acreage reflects less emphasis on steeper, less productive areas (primarily stocked with lodgepole pine) and more emphasis on areas with higher productivity. Harvest levels have been established according to the economic viability of individual areas. Forest standards and guidelines are established which will insure that timber sales will not have adverse effects on wildlife, recreation, water, scenic beauty or other resources.

small sales to local mills for rough-cut or for logs used for log homes seems fine. Fuel gathering, pole cutting, etc are fine and benefit our people directly without establishing clearcut sacrifice areas. Enough on timber. 1

I feel there are enough roads in the Shoshone Forest. People don't go to the forest because there are roads there. They go because it is an area where vast tracts are without roads. In terms of access to the forest by the inexperienced person, an improvement in the trail systems would be of benefit. Many people are afraid to leave the roads for fear of getting lost, or are made uncomfortable at the thought of no toilet facilities or "safe" drinking water. Instead of building expensive roads so people can plow around in their cars, why not an extensive system of "tenderfoot trails"? Get the average everyday person out into the woods, at less cost, for a higher quality experience. Self-guided nature trails are very popular in some parts of the country. 2

Finally, regarding oil and gas leasing, I feel that many areas should not be open for permitting. High use areas should be withdrawn. The idea of a drilling rig at the falls in Sinks Canyon is poor management. In the middle of a world oil and gas glut do we need to sacrifice these recreation areas? It will always be there (the oil) if we do need it badly in the future. 3

These are my sincere feelings on the draft. I am a life-long resident of Wyoming (mostly Fremont County) attending the University. Please consider my comments regarding your decisions for the Shoshone Forest.

Sincerely,

James W. Minick

James W. Minick

Jim Minick
Box 3821
Laramie, Wyo 82071

16-2 In response to numerous concerns, the number of acres managed for timber harvest and the resultant amount of roads has been reduced in the final Plan. In the next fifty years, the Plan projects only eighty miles of new road which will be open to the public. There is projected 120 miles of existing road which will be improved and remain open to the public. An additional 150 miles of new road, and 255 miles of reconstructed existing roads are projected to be closed to the public within the 50 year period. Road construction and reconstruction figures have been corrected. See also response to comments 182-5, 33-9, 80-5, and 44-46.

16-3 The General Mining Laws guide what can or cannot be withdrawn from mineral entry and under what conditions. We direct your attention specifically to Plan, Chapter III in the blue pages under Mining Law Compliance and Administration (General Direction 1C and 2) and Minerals Management Oil and Gas and Geothermal (General Direction 1). All direction found under Minerals Management, supplemented by Plan Appendix K, is intended to protect existing and proposed uses of the land for other resources thereby avoiding the need for withdrawal. If exceptional situations arise, or existing direction is shown to be insufficient, the option of withdrawal remains.

Mineral operations are by law, a viable use of public land. Our charter, provided by Congressional action, is to manage first according to law, and not strictly according to variable market pressures. The mining laws stipulate that lease applications can be made and must be considered for lands not withdrawn. The Forest Plan was selected in large part because it allows mineral activities while recognizing and maintaining the values of clean water, stable wildlife populations, and recreation opportunities which are of primary importance to many Forest users. The Forest Plan affords adequate protection of popular recreation areas, critical wildlife habitat, and other such resource values through application of stipulations and recommended operating procedures. Protection may be in the form of seasonal restrictions or no-surface-occupancy stipulations (see Appendix K of the Plan).

One consideration here is that a lease may never result in actual drilling activity; historically, a low percentage of leases are explored or developed, due in part to market fluctuations and uncertainties.

Comment 17

Forest Service Response

RECEIVED SEP 3 1985

FPD-TI-E-L-C
Proj. No. Orig Typo Affil

Dear Sir,

I would like to see enough timber sold to take good care of our forest. As it is the trees are dieing faster than they are being harvested.

Besides there are lots of jobs depend on timber harvest, people who own homes and have children in school.

I would like to see enough timber harvest in the plan so people could have year round jobs.

Wayne Lewis
Box 243
Dubois Wyo
82513

VI-58

1 17-1 Timber Harvest levels in the Forest Plan have been established according to economic viability, and timber type and condition. Harvest levels in the Plan remain approximately the same as in the proposed Plan, and are slightly higher than levels of the last ten years.

Comment 18

Forest Service Response

FDP- 18- 0- L- 0
Proj. No. Orig Type Affil

RECEIVED SEP 1 0 1985

Kenneth Goldsmith
555 Forest Road
Northford, CT 06472

Sept. 7, 1985

Forest Supervisor
Shoshone National Forest
225 West Yellowstone Ave.
P.O Box 2140
Cody, WY 82414

Dear Sir,

VI-59

Several years ago I had the opportunity to spend an exceptional five weeeks in and around the North Absaroka Wilderness. Subsequently, I have returned a number of times to explore many other areas on the Shoshone NF. On the basis of these experiences I would like to submit the following comments regarding the draft Forest Plan and EIS for the Shoshone National Forest, on behalf of myself and many other Americans who do not live in Wyoming but return time and again to experience its beauty and natural bounty.

I strongly oppose your proposed plan, Alternative D, both as a recreational user of the Shoshone NF and as an American taxpayer. It is apparent to anyone with even a limited knowledge of economics that timber harvest on the Shoshone is a money-losing proposition. Furthermore, logging and road-building in previously undeveloped areas threatens to devastate wildlife and recreational resources on the Shoshone far out of proportion to the supposed benefits. The managers of the Forest would be wise to recognize the tide of public opinion which is building around the country in opposition to below-cost timber sales, as well as the implications of the recent decision by the Asst. Secretary of Agriculture in the appeal of two Forest Plans in Colorado. A decision to continue current harvest levels on the Shoshone NF (and especially to increase harvest levels, as proposed in Alt. D) is likely to meet very strong public opposition. 1

I have a number of concerns which are relevent to any of the Alternatives. First, mineral exploration on the Forest must be tightly controlled to avoid serious adverse environmental impacts. The known value of the wildlife and other natural resources of the Forest should take priority over highly speculative oil and gas exploration. Second, grazing levels should be reduced somewhat to lessen the sometimes severe conflicts with wildlife, and especially to reduce grizzly bear/rancher conflicts. The statement in the EIS that "grizzly bear habitat would be managed to achieve a recovered population by the end of the planning horizon" MUST be taken seriously and followed up with significant actions. This is a matter of national concern about which many Americans feel very deeply. Third, I question your projection for sustained increases in sawtimber demand from the Forest. Fourth, I strongly object to any timber harvest directly adjacent to the DuNoir Special Management Area and in any area allocated to Prescription 3A (semi-primitive, non-motorized recreation). While the "wilderness question" may be settled for now on Wyoming's National Forests, there remains a tremendous need for additional areas free of development and man's influence - both for people and the native wildlife. I particularly oppose planned timber sales in the Trout Creek (17155) and Basin (17002) Analysis Areas. Finally, I urge you to include more maps in the Final EIS displaying the distribution of various resources on the Forest in order to facilitate public understanding (I recommend you look at the draft Targhee NF Forest Plan). 2 3 4 6 5

18-1 Timber sales selected through the forest planning process have been selected to maximize present net value. Data is based on historic selling value and experienced costs. It is anticipated that future sales will not be "below cost" sales according to present knowledge of selling values and costs. Wildlife and recreation values have not been included in the calculations of PNV for the purposes of selecting sales for harvest.

18-2 Restrictions are included in the Plan to insure that wildlife and other natural resources are adequately protected during oil and gas exploration. Grazing will be managed at a level compatible with wildlife and range objectives, and at a level compatible with grizzly objectives, which is ultimate recovery and delisting.

18-3 The sustained yeild level established in the Forest Plan is based on projections of timber growth under prescribed management. These projections included estimates of mortality from insects and disease based on part insect and disease experience on the Forest.

As population, nationally, increases and as international markets open for timber from the United States, demand for wood is projected to increase over the next 50 years. These national demand trends were disaggregated to the Forest level and modified based on the type timber and timber industry the Forest can support. The combination is a relatively small and slow growing demand for timber over the next 50 years. See also response to comment 44-44.

18-4 In the 1984 Wyoming Wilderness Act, Congress directed that nonselected roadless areas be released for multiple use purposes, and that "buffer areas" were not to be considered adjacent to wilderness. With this in mind, the Wolf Creek timber sale has been included in the Forest Plan. Planned sales between Five Mile Creek and the Dunoir Special Management Unit have not been included in the Forest Plan; this has been allocated to Management Area 3A rather than Management Area 7E. No logging or road building will take place in the Dunoir Special Management Unit. See also response to comment 44-46.

18-5 To facilitate display of the Forest Plan, a larger map scale has been used in the Forest Plan and Analysis Area maps. Further, there are more displays of individual resource data incorporated in the documents.

Comment 18

FDP- 18- 0- 1- C
Proj. No. Orig Type Affil

In conclusion, I urge you to adopt Alternative C as your Proposed Plan for the Shoshone NF. This is a moderate, balanced way of meeting the many demands on the Forest without severe impacts on any one resource. A mild reduction in timber harvest and grazing levels improves environmental protection while actually increasing the present net value of the proposal. I cannot think of a more reasonable course of action for all concerned. 7

Please send me a complete copy of the final Shoshone Forest Plan and EIS when it becomes available. Also, please continue to keep me informed of Shoshone NF planning activities.

Thank you.

Sincerely,

Ken Goldsmith

Forest Service Response

18-6 The Shoshone National Forest is 57 percent wilderness. The Wyoming Wilderness Act of 1984 specifically mentions release of lands not designated as wilderness for multiple use, specifically condemns the concept of nonwilderness buffers around designated wilderness, and states that lands not designated as wilderness need not be managed to preserve wilderness character. Many of the nonwilderness areas are protected from development because of being critical for wildlife, unproductive for wood fiber production, or critical for visual corridors. Regardless of entry into a few of the many remaining roadless areas, the Forest will remain overwhelmingly unroaded and more or less undeveloped. Our charter is to manage for multiple-use, not just preservation.

The uses of the Forest other than preservation and nonmotorized recreation, such as wood fiber production, domestic livestock production, oil and gas development, developed recreation, and motorized recreation, have been provided for to the extent possible given a stewardship objective. The Forest Service feels that these more commodity-oriented uses have been provided for in balance with the noncommodity uses in the preferred alternative.

The Forest Service does not agree with a proposal to change the management direction emphasis in Management Areas 150-Logan Mountain, 138-Dunn Creek, and 155-Trout Creek to a 3B management emphasis. The Logan Mountain area has a very low standard road in it which is utilized by mechanized equipment by the existing range permittee to carry out management activities. The 7E area in the Trout Peak area has been changed to a 3A management emphasis. Existing system trails, developed trailheads, range structures, Robber's Roost cabin, and an outfitter camp precludes these areas from being managed under a 3B emphasis.

18-7 Based on all analysis, the Forest Service believes that Alternative D presents a more balanced mix of Forest uses than Alternative C. Alternative D as a whole responds better to the issues and concerns identified.

RECEIVED SEP 10 1985

9/7/95

FDP - 19 - P - L - C
Proj. No. Orig Type Affil

FOREST PLAN COMMENTS

NAME: Chuck Neal

ADDRESS:
1526 Alger Ave
Cody, WY 82414

COMMENTS:

I am writing to support Alternative E (Reduced Budget) option of the proposed Shoshone National Forest plan. The problem, as I see it is not that the F.S. does not recieve enough budget; the problem is how they spend it. If we eliminate the minerals activities, logging operations, road construction and livestock grazing there will be plenty of budget for the programs on the Shoshone N.F. of truly national, indeed even international, importance — the wildlife and wilderness resources

Your document states that under this Alternative E, 99 percent of the forest will be late successional vegetation, and that we will have to be content with seeing pine martens and goshawks instead of elk and sheep.

1 19-1 The Forest Service is required by various laws, chief of which is the Multiple-Use Sustained-Yield Act of 1960, to administer the national forests for outdoor recreation, range, timber, watershed, and wildlife and fish purposes. The Mineral Leasing Act of February 20, 1920, pertains to the leasing and extraction of minerals from all lands of the United States, including national forest. Elimination of minerals activities, logging operations, road construction, and livestock grazing is unlawful and is not a viable alternative.

2 19-2 It is recognized that uncontrolled fire would reduce the percentage of late successional vegetation; however, management under this alternative would still result in a very high percentage of this vegetation type and associated wildlife species.

Comment 19

Forest Service Response

I doubt this. This statement assumes that there will be no fire. Along with supporting Alternative E, I include a severely reduced fire budget. We should have fires burning somewhere in the forest often enough that we will have a large diversity of vegetational stages present. In any case, a goshawk is just as satisfying to see as an elk. 2

In summary, selection of Alternative E with elimination of the so-called commodity programs- minerals, livestock, logging, roading- will result in an adequate budget for the truly important resources - wildlife and wilderness - that the Shoshone N.F. has to offer to the nation and the world. 3

19-3 See response to comment 19-1.

Sincerely
Chuck Neal

RECEIVED
SHOSHONE NAT. FOREST
SEP 13 11 29 AM '76
U.S. FOREST SERVICE
COODY, WYOMING

Comment 20

Forest Service Response

RECEIVED SEP 1 2 1935

FDP - 20 - F - L - C
Proj. No. Orig Type Affil

Dear Sir,

I would like To see more Timber harvest put in your plan. If we take care of our Forest it will take care of People and Wildlife. There is enough For all.

We are destroying the history of Wyoming, with the wilderness we have created. But some people who have lived here and some from other places don't seem To care about that.

I'm not saying I know all there is To know about Trees. But I do know they have To be keep up, or they won't be good for any one. Not even the Wildlife.

Linda Davis
Box 843
Dubois Wyo
82513

VI-63

1

20-1 Timber Harvest levels in the Forest Plan have been established according to economic viability, and timber type and condition. Harvest levels in the Plan remain approximately the same as in the proposed Plan, and are slightly higher than levels of the last ten years.

Comment 21

Forest Service Response

RECEIVED SEP 1 2 1985

NORTHWEST COMMUNITY COLLEGE
POWELL, WYOMING 82435

FPD - 21 - P - L - E
Proj. No. [illegible]

September 11, 1985

Stephen P. Mealey
Forest Supervisor
Shoshoni National Forest
P. O. Box 2140
225 W. Yellowstone Ave.
Cody, WY 82414

Dear Mr. Mealey:

I appreciate the opportunity to review the Land and Resources Management Plan for the Shoshoni National Forest. I have studied the Alternatives carefully and feel I have a pretty good handle on the proposed Alternative.

While I support Alternative D which has emphasis on production of non-commodity resources, I have questions on the order of magnitude of the various impacts. I would like to compliment you on arriving at Alternative D and if the values are reasonably close to what you project, I think that it is the Alternative in the best interest of the local people as well as the nation.

I would also like to express my appreciation for an opportunity to participate in developing the long term plan for Shoshoni National Forest.

Thank you and keep up the good work!

Sincerely,

Wes Vining

Wes Vining, Chairman
Life and Health Science Division

WV/df

Thank you for your comment.

Comment 22

Forest Service Response

RECEIVED SEP 1 2 1985

EPD-22-E-6-C
Proj. No. Orig. Type AREA
September 10, 1985

Dear Steve,

We appreciated the forest tour and good discussion last weekend and want to thank you for making the effort to show current timber management practices in the Wind River District. I think we all have a much better understanding of what we want to see happen on the forest in the future. As I told you that day, I feel much more comfortable with the sensitivity the Forest Service has developed in many of the more critical areas of the forest management. This is definitely a step in the right direction and the Forest Service deserves credit for these efforts.

That certainly isn't to say that perfection has been reached, nor that we can call off the dogs (watchdogs, that is). As I mentioned several times, I still have problems with logging roadless areas on the Shoshone. In the Wind River District this translates to questions about the proposed timber sales on Wolf Creek and Five/Six Mile Creeks. These areas of the Dunoir Valley are part of what make that area so spectacular. I listened to your ideas on how the logging would improve the area for wildlife and recreation, but my experience with the effects of even select cuts has not been very positive in terms of those two values on the forest that I hold dear. This may be a case of trust and it is difficult to trust a system that has chronically shown a bias toward over-managing timber on public lands. 1

As I told you, I can appreciate the value of community stability from natural resources on public lands, but I can see that the Forest Plan is proposing to harvest more timber than community stability demands in this case. Between the two steady mills on the forest 7 mmbf are cut annually. In addition, there is the Wyoming Wood Products mill in Lander. I see a reasonable compromise between the commodity and amenity uses of the forest's resources as supporting these industries. Any more would be excessive in such an area that qualifies as part of the Greater Yellowstone Ecosystem and a hidden jewel in the national recreation system throughout the country. This means that large, specialized mills such as Louisiana-Pacific have no place in an area where recreational opportunities are as high as they are around Dubois and timber regeneration is so slow. Certainly you can appreciate the difference in values here. It is not up to the Forest Service to provide resources to anyone who wants them, but rather to meet the public needs. People use 2x4 studs and they use pristine areas, so we must compare the output and value of each of these items on the Shoshone. The contribution the LP mill in Dubois makes to the lumber market is so negligible in comparison to the popularity Yellowstone and its surrounding lands make to the recreation market that the distinction can clearly be seen. 2

In this context roadless areas are of tremendous value and higher than necessary timber sales of little value. I think that is the difference we would like to impress upon you; in the Greater Yellowstone Ecosystem, business as usual multiple use management is undesireable. We would like you to continue your present timber practices in the areas that are already roaded, but we consider the roadless areas of a higher value if they remain as they are and are managed for their recreational and wildlife values. In addition, areas in the Dunoir in particular should be protected as they are, since it will detract from the possibility of the Dunoir Special Management Unit ever being added to the National Wilderness System. I hope you're right about the low risk of the Dunoir Special Management Unit issue coming up again soon. Regardless of that possibility, we would like to see the Dunoir maintained as a roadless area. 3

VI-65

22-1 In the 1984 Wyoming Wilderness Act, Congress directed that nonselected roadless areas be released for multiple use purposes, and that "buffer areas" were not to be considered adjacent to wilderness. With this in mind, the Wolf Creek timber sale has been included in the Forest Plan. Planned sales between Five Mile Creek and the Dunoir Special Management Unit have not been included in the Forest Plan; this has been allocated to Management Area 3A rather than Management Area 7E. No logging or road building will take place in the Dunoir Special Management Unit. See also response to comment 44-46.

22-2 The level of timber harvest proposed is based on almost entirely on timber economics alone, not considering benefits to recreation, wildlife, and community stability. Employment and other benefits of recreation, tourism, and wildlife were considered in the planning process. The Forest Service sees no reason to reduce harvest levels below that which was shown to provide a positive economic return. See also response to comments 18-3 and 44-44.

22-3 The Shoshone National Forest is 57 percent wilderness. The Wyoming Wilderness Act of 1984 specifically mentions release of lands not designated as wilderness for multiple use, specifically condemns the concept of nonwilderness buffers around designated wilderness, and states that lands not designated as wilderness need not be managed to preserve wilderness character. Many of the nonwilderness areas are protected from development because of being critical for wildlife, unproductive for wood fiber production, or critical for visual corridors. Regardless of entry into a few of the many remaining roadless areas, the Forest will remain overwhelmingly unroaded and more or less undeveloped. Our charter is to manage for multiple-use, not just preservation.

The uses of the Forest other than preservation and nonmotorized recreation, such as wood fiber production, domestic livestock production, oil and gas development, developed recreation, and motorized recreation, have been provided for to the extent possible given a stewardship objective. The Forest Service feels that these more commodity-oriented uses have been provided for in balance with the noncommodity uses in the preferred alternative.

Comment 22

Forest Service Response

FPD-22-F-L C
Proj. No. C-17

In order to accomplish such a goal, it would seem in the best interest to reduce the annual timber harvest in the Plan to a level below 8 mmbf. At that level, community stability and roadless areas maintained at a reasonable compromise for public needs on the Shoshone during the next five decades. 3

We did not have an opportunity to discuss proposed timber sales on Five/Six Mile Creeks and the extension of the Brent Creek Road that are scheduled during the next decade. Such a proposal would surely reduce and narrow the migration corridor for elk traveling between the Yellowstone country and the winter range. A much increased harvest could be expected especially considering the increased access on Wolf Creek. I realize the Wy. Game and Fish Department seeks some increase in the harvest of "tourist" elk, but road improvements occurring so close within the same decade may cause a higher annual harvest than would be healthy for the herd. Or, it may have the negative effect of pushing the elk off the forest onto private lands during their migration which could cause even more conflict. 4

22-4 See response to comment 22-1.

I am very apprehensive of your optimistic attitude toward grizzly bears' ability to adapt to timber sales as well as other resource extraction projects. Research I have read indicates that the Yellowstone bear population is stressed by habitat reduction and development. The Preferred Alternative in the Plan indicates an improvement of grizzly habitat from logging; however, history has proven otherwise. I am curious of the basis for this judgement. The food sources may eventually increase following logging but the initial displacement of the bears is a substantial risk considering their low number. Human/bear conflicts are inevitable where timber sales are proposed in occupied grizzly habitat. Increased conflicts could result in an increase in grizzly bear mortalities and unless bear mortalities are reduced, there is little reason to expect the population to recover. 5

22-5 It is recognized that disturbance activities such as timber sales can displace grizzly bears and potentially increase the risk of bear mortalities. Mitigation measures such as provisions for adjacent security areas and stringent controls on timing and administration of activities will be incorporated as necessary in timber sales. As indicated, logging can improve the quality and quantity of bear foods.

I am glad that we had the opportunity to communicate with each other and I will know that our discussion last weekend was profitable if the timber harvest is reduced in the Final Plan.

Sincerely,

Meredith Taylor

Meredith Taylor
Spring Ranch RR 31
Dubois, Wy. 82513

cc: Tom Portice

Comment 23

Forest Service Response

RECEIVED SEP 13 1985

FPD - 23 - O - L - E
Proj. No. Orig Type Appl

Continental Divide Trail Society

P.O. BOX 30002 BETHESDA, MD. 20814

September 9, 1985

Forest Supervisor
Shoshone National Forest
P.O. Box 2140
Cody, Wyoming 82414

Dear Sir:

We wish to comment upon the Proposed Land and Management Resource Plan for the Shoshone National Forest.

We are pleased that the plan provides for interim management of travel route alternatives for the Continental Divide National Scenic Trail. Unfortunately, however, the alternatives are those "identified in the CDNST Comprehensive Plan." This is an inadequate statement, since the comprehensive plan has never been published and is not available for review. Besides the route shown on your maps, the following additional alternatives should be afforded interim management under General Direction #0354:

Area 191 - Wind River. The direct route from Brooks Lake Lodge to Togwotee Pass, as described in our Guide to the Continental Divide Trail, v. 3: Wyoming (pp. 62-63). 1

Area 108 - Pine Willow. The Pine Creek Trail, as described at pages 121-122 of the same guidebook. (This also appears as marked alternative #4 on Map 35 of the draft CDNST Comprehensive Plan.) 2

We further propose that in Area 191 - Wind River, the valley between Brooks Lake and Upper Brooks Lakes should be classified 3A, as are the contiguous lands. If vehicles are permitted at all, they should be restricted to historic use under classification 2A [certainly not 2B]. A revision to the plan is needed to better preserve the values of the CDNST. 3

The procedures for selecting a route for official CDNST designation are not addressed. The procedures will need to afford an opportunity for public participation, with consideration of alternatives as appropriate. We look forward to playing an active role in that process, and we understand that nothing in the present plan limits our opportunity to do so. 4

We would appreciate your furnishing us a copy of the final plan and environmental impact statement. Thank you.

Sincerely,

James R. Wolf
Director

VI-67

23-1 The EIS for the Bridger-Teton Land and Resource Management Plan will be the lead document for the Continental Divide National Scenic Trail in this area of Wyoming. The Shoshone Forest Plan will leave routes open as options until the Bridger-Teton EIS is finalized. The Bridger-Teton EIS will display the preferred route upon which Shoshone National Forest will implement the complimentary route on their jurisdiction.

23-2 The major portion of the Continental Divide National Scenic Trail, (CDNST) lies within the Bridger-Teton National Forest and they were given the task of identifying and evaluating various trail locations. The CDNST corridor shown in the Shoshone National Forest plan is only one of the alternatives being considered in the Bridger-Teton Forest Plan. The procedures used for selecting alternatives routes will be discussed in the Bridger-Teton Forest Plan when it is published and the public will be given an opportunity to participate in the selection at that time. The Shoshone Forest Plan will be amended as needed to incorporate the Bridger-Teton Forest's selected alternative.

23-3 The majority of the area in question has been re-allocated to 3A. None has been allocated to 3B.

23-4 See response to comment 23-1.

Comment 24

9/11/85

RECEIVED SEP 1 6 1985

FPD-24-0-L-C
Proj. No. Orig Type Affil

DEAR FOREST SUPERVISOR,

I WOULD LIKE TO EXPRESS MY CONCERN THAT YOUR UPCOMING FOREST PLAN INCLUDE CAREFUL CONSIDERATION OF IT'S IMPACT ON THE GREATER YELLOWSTONE ECOSYSTEM. TO MY KNOWLEDGE, NONE OF THE DRAFT PLANS RELEASED TO DATE HAVE DONE AN ADEQUATE JOB OF INCORPORATING THE PRESERVATION OF A HEALTHY GREATER YELLOWSTONE ECOSYSTEM INTO MANAGEMENT POLICIES.

THIRTY YEARS AGO MY PARENTS WORKED IN YELLOWSTONE, AND A FEW YEARS AGO I ALSO WORKED IN YELLOWSTONE. I HIKED ALOT OF MILES IN YELLOWSTONE AND THE SURROUNDING NATIONAL FORESTS. I HAD THE OPPORTUNITY TO OBSERVE A GRIZZLY BEAR ON A HIKE THAT BEGAN ON EAGLE CREEK IN THE SHOSHONE NATIONAL FOREST. THE GREATER YELLOWSTONE ECOSYSTEM IS THE LAST PLACE IN THE LOWER FORTY-EIGHT STATES WHERE THIS CAN HAPPEN. 1

I WANT TO ENCOURAGE THE FOREST SERVICE TO MAXIMIZE THE WILDLIFE, WILDERNESS, AND RECREATIONAL VALUES OF THE GREATER YELLOWSTONE ECOSYSTEM. WILLIAM PENN MOTT, JR. HAS SAID "WE MUST ERR ON THE SIDE OF PRESERVATION." TIMBER, MINERAL, AND GRAZING INTERESTS ARE IMPORTANT, ESPECIALLY FOR THOSE WHOSE JOBS IT AFFECTS, BUT THE GREATER YELLOWSTONE ECOSYSTEM IS A ONE-OF-A-KIND PLACE, AND I WOULD LIKE TO SEE IT REMAIN ESSENTIALLY UNDEVELOPED. 2

SINCERELY,

STEVE BRYANT

STEVE BRYANT
3353 MADISON AVE #317
BOULDER, CO
80303

VI-68

Forest Service Response

24-1 Components of the "greater Yellowstone ecosystem" (such a system has not been defined) include the habits and habitat of the grizzly bear, migratory patterns of other wildife such as deer and elk, and vegetation systems such as grassland/sage ecosystems and timber ecosystems. Data collection, formulation of alternatives and analysis of alternatives including selection of the preferred alternative explicitly included consideration of maintaining the viability of all of these systems. This is a requirement in the regulations governing preparation of Forest Plan. This is portrayed throughout both the EIS and Plan. For example, provisions for recovery of the grizzly bear as dictated by the interagency committee for recovery were incorporated directly; protection of crucial preferred winter range for deer, elk, moose and bighorn sheep were included in all alternatives with most including activities designed to improve habitat; and Appendix F to the Plan includes direct consideration of the role of fire in the plant ecosystems of the Forest and fire prescriptions are written to allow fire to play its vital role. In this way, the viability, protection and enhancement of the natural ecosystems that are found in the Greater Yellowstone area are directly included in the Plan.

The Shoshone provides access to the east and northeast entrances to the Park. The Forest provides camping facilities as well as lodges and resorts which are used by visitors to the Park and the Forest. The vast majority of Forest land along the border of the Park is wilderness. The major species of wildlife that use both the Park and the Forest during the year are elk and grizzly bears. Major areas for consideration, then, are transportation, camping facilities, resorts and lodges, wilderness use, elk, and grizzly bears.

Consideration of Park needs for access and developed recreation sites were gathered early in the planning process and used throughout to guide development of alternatives. This included considerations for developed recreation sites built into demand projections used in planning. Preservation of wilderness and management of wilderness use were identified in the scoping process, were identified as a Planning Problem, and have been specifically considered throughout the planning process.

Management of the elk populations that migrate between the Park and the Forest is the responsibility of the Wyoming Game and Fish Department. The Forest has involved this agency directly in data collection, mapping, and evaluation of alternatives throughout the planning process. As a threatened species, management of the Grizzly Bear is the responsibility of the U.S. Fish and Wildlife Service. Coordination efforts for the bear in the greater Yellowstone area are done through this agency and the Interagency Grizzly Bear Committee.

24-1 Management of Forest uses that are of joint concern to the Park and Forest are guided by joint committees which draft policies for these uses. One example is the effort which produced the Outfitter Guide Policy for the greater Yellowstone area. This is done so that activities on adjoining Forests and Parks are coordinated and consistent. These considerations have been included in all alternatives. Coordination activities specific to the Plan include:

- creation and adoption of the Guidelines for Management Involving Grizzly Bears in the Greater Yellowstone Area in 1979. The Forest took the leadership role in the development of these guidelines. Development included coordination of all National Forests in this area as well as both National Parks. As adopted in the Forest Plan, these guidelines have been incorporated in Forest Direction and require special standards for such actions as timber harvest, road management, and oil and gas leasing and operations.

- scoping for the Plan in 1980 which requested concerns of the Park.

- actions necessary for providing winter range for elk that migrate from the Park were included in development of planning criteria, data collection and mapping, analysis of production capabilities, and formulation and analysis of all alternatives. This began in 1980 with direct involvement of the Wyoming Game and Fish Department in all phases of planning and continues today. Major areas of input include mapping of crucial preferred winter ranges (CPWR), setting habitat capability targets for each herd unit, and establishing dates for closures of these areas to motorized vehicles and oil and gas operations.
- participation in semi-annual meetings of the Greater Yellowstone coordination committee involving all Forests and both Parks. Forest Planning and Plans are always an agenda item at these meetings in order to facilitate coordination. Further, coordination of plans and Forest planning was an all-day agenda item at the meeting of this group in the Spring of 1985.

- participation in a coordination meeting in May of 1982 discussing such items as the management of the Beartooth Highway; a road jointly managed by the Forest and Park which provides access to the northeast entrance to the Park. During that meeting the Forest Planner briefed the Park Planner on planning and planning processes being used on the Forest.

- participation in semi-annual meetings of the technical subcommitte for interagency coordination of the grizzly bear. Forest Plans and how they effect the bear are included in these meetings. Any policy revisions stemming from these meetings are incorporated in the Forest Plan.

- providing a copy of the Proposed Plan and DEIS to the Park at the same time they were mailed to all others on the mailing list for review and comment.

There are other coordination activities that occur between the Park and the Forest as well as between the Forest and other agencies where joint decisions may effect management of the Park. These are not directly oriented to development of the Forest Plan, but because they directly effect management of the Forest, the results from these activities are incorporated in planning and in the Plan. Such activities include:

- frequent meetings regarding the management of the Beartooth Highway which is maintained by the Park though it is part of the Forest road system and is on the Forest. For example, there were several meetings and discussions regarding this road and its management during 1984 and 1985 in conjunction with a lawsuit regarding the Clarks Fork Snowmobile Trail.

- meetings regarding developed recreation needs on the Forest in response to changes in Park management. For example, Park Service personnel visited the Forest in August of 1985 to inventory sites for campgrounds to possibly replace facilities that may be closed at Fishing Bridge in the Park.

- informing the Park of environmental analyses that may have a bearing on their management and inviting comment throughout the analysis procedure from scoping to review of draft documents. This includes environmental analysis of mineral activities such as:

  - the DEIS for Oil and Gas Exploration and Leasing within the Washakie Wilderness starting in May of 1981 to April of 1982,

  - the EIS's for an APD along the North Fork of the Shoshone from 1983 through 1985,

  - an EA dealing with seismic operations on the Forest beginning in late 1983 and continuing through 1985, and

  - an analysis of oil and gas lease proposals alnong the South Fork of the Shoshone River being done currently.

- participation in activities relating to the reconstruction of the highway accessing the east entrance to the Park planned by the State Highway Department beginning in the Spring of 1984.

- participation in interagency committees dealing with outfitters and guides, wilderness management policies and recovery of the grizzly bear. Often, the Forest has taken a leadership role in these activities.

- sponsoring wilderness management workshops annually on the Forest where coordinated management policies are presented.

24-1

- taking the lead in developing policies regarding management of back-country and wilderness areas to reduce human-grizzly bear conflicts. This led to the development of an EA published in June 1985 which is guiding current management and has been incorporated in Forest Direction in the Plan.

- participation in a cooperative law enforcement effort during hunting season aimed at reducing grizzly bear mortalities and reducing conflicts between hunters and the bear.

- providing information in response to concerns and questions from Park personnel regarding minerals related activities such as letters to Ken Czarnowski, Resource Manager, and Wayne Hamilton, research geologist, for the Park.

- placing a stream monitoring station on a stream that runs from the Forest into the Park.

Beyond these activities, the Forest has provided a great deal of information to a public interest group (The Greater Yellowstone Coalition) regarding a full range of activities from planned timber sales, leasing, oil and gas development, planned roads, and management of recreation and wildlife. This included involving this group directly in Forest Planning throughout the spring and fall of 1984, participating in meetings sponsored by them over the last two years, and hosting a field trip for memebers of this group in September 1985. This group provides a service of informing all who are interested in management of the the Greater Yellowstone area of activities of all agencies.

24-2

The Shoshone National Forest is 57 percent wilderness. The Wyoming Wilderness Act of 1984 specifically mentions release of lands not designated as wilderness for multiple use, specifically condemns the concept of nonwilderness buffers around designated wilderness, and states that lands not designated as wilderness need not be managed to preserve wilderness character. Many of the nonwilderness areas are protected from development because of being critical for wildlife, unproductive for wood fiber production, or critical for visual corridors. Regardless of entry into a few of the many remaining roadless areas, the Forest will remain overwhelmingly unroaded and more or less undeveloped. Our charter is to manage for multiple-use, not just preservation.

The uses of the Forest other than preservation and nonmotorized recreation, such as wood fiber production, domestic livestock production, oil and gas development, developed recreation, and motorized recreation, have been provided for to the extent possible given a stewardship objective. The Forest Service feels that these more commodity-oriented uses have been provided for in balance with the noncommodity uses in the preferred alternative.

Comment 25

Forest Service Response

RECEIVED SEP 1 7 1985

FPD - 35 - E - L - C
Proj. No. Orig Type Affil

August 14, 1985
Attn Mr. Mealey
U.S. Forest Service Supervisor
Shoshone National Forest
P.O. Box 2140
Cody, Wyo 82414

Dear Mr. Mealey,

It is true that the passage of the 1984 Wyoming Wilderness Bill resulted in substantial timber supply reductions for the Dubois area.

But it is also true that given intensive management of the remaining forests outside of wilderness, there is an adequate supply to sustain existing industry.

165 families work for Louisiana Pacific. We own our homes and have children in school.

Dubois economic future depends a lot on the timber industry.

Sincerely
Wayne Ferris
Box 243

VI-71

1 25-1 Timber Harvest levels in the Forest Plan have been established according to economic viability, and timber type and condition. Harvest levels in the Plan remain approximately the same as in the proposed Plan, and are slightly higher than levels of the last ten years.

Comment 26

Forest Service Response

RECEIVED SEP 17 1985

FPD - 26 - F - b - C
Proj. No. Orig Typo Affil

Sept 14, 1985
Attn Mealey
U.S. Forest Service Supervisor
Shoshone National forest
P.O. Box 243
Cody, Wy 82414

Dear Mr Mealey

We need more of a timber supply. 165 people and families in Dubois depend on it.

The timber supply is there if managed right.

I do not like the kind of - management we have in yellowstone park where the forest are dying and building a potential for large forest fire.

Sincerely Yours
Linda Lewis
Box 943
Dubois Wyo
82513

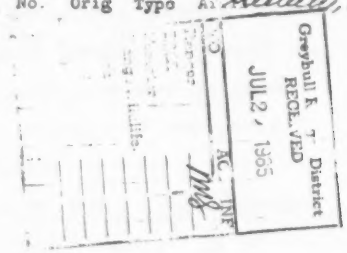
VI-72

1 26-1 Timber Harvest levels in the Forest Plan have been established according to economic viability, and timber type and condition. Harvest levels in the Plan remain approximately the same as in the proposed Plan, and are slightly higher than levels of the last ten years.

Comment 27

Forest Service Response

EIS - 27 - F - 1 - C/O Box 378
Proj. No. Orig Typo Ad Meeteetse, Wyo



U.S Forest Service
District Ranger
Meeteetse, Wyo

In the Shoshone National Forest proposed fifty year plan, I find a few items that I think need some more consideration.

On page J-71 of Appendix J, the recreation section talks mainly about cross-country ski trails. The recreation in this area should also include all other types of activities such as snowmobils. These people also have a right to use this wonderful country.

On this page is also addressed the road closing. This concerns me very much. To close this area for six months can't possibly have documintation to support it. The damage is already there due to hunting season. If the harrasement of game animals is the issue, then closing the roads and area is still not the answer. I would say That we should make the fines stronger for Those who violate the laws, after all, if a person is stopped for speeding between Meeteetse and Cody,

1

27-1 Closures of areas to motorized vehicles is due to the impacts of those vehicles on wildlife during the period they are on winter range and/or are occupying areas used for birthing. The impact during these periods on wildlife is documented and supported by research and a number of environmental analyses done on this Forest over the last 5 years. The philosophy of the plan is to provide for production of noncommodity values such as high quality wildlife habitat. Closure of these areas during the occupied times is a means for accomplishing this.

Comment 27

2.

FPD - 27 - P - 6 - C
Proj. No. Orig Type Affil

we don't close the highway, we fine the person breaking the Law.

Anytime public lands are closed to the public, they are no longer public lands. The people of the Meeteetse area have protected and loved these forest lands too long to allow them to be distroyed, so let these people help you in the protection of the forest, don't take the land away from them. 1

On page J-75, the plan also talks about a six month closing of public lands. I really think the people who proposed this should have to prove that there really is a problem, then we could cure the problem and not close the land.

In this wonderful country, we have many privileges, but each time one is taken away, we lose something that will change our way of life for ever. So many people are interested in the habitat of the wild life, and so am I, but they fail to realize that many of the changes proposed also affect our habitat and way of life

Thank you.
Clark C Barnett

Comment 28

Forest Service Response

August 13, 1985

FPD - 28 - P L C
Proj. No. Orig. Appr. Mail

U.S. Forest Service
District Ranger
Meeteetse, Wyoming

Comments to the Deer Creek, Dick Creek, Timber Creek and the Greybull Ranger District In General

Recreation and transportation in these areas are of great concern to me. These areas have been used for winter recreation and travel for many years without distruction to the land or wildlife. It seems to me that the closure of these areas to winter activities is not justified.

In the years past the weather conditions and snow depth have governed the road closures to wheeled vehicles. I believe that this problem does not need to be addressed in this management plan.

The major damage to the roads comes in the Fall season when snow fall begins and before the ground freeze begins. The roads are heavily used at this time for Big Game Hunting and road damage at this time is unavoidable. Through the proposed time of the road closures Jan. 1 thru June 30 snow is generally to deep for vehicles to travel. If it be an open winter where wheeled vehicles could travel the frost in the road bed would prevent any damage to the roads. It is understandable that when the spring thaw begins that there should be some temporary closures to avoid road damage.

The winter recreation in these areas is probably of the most concern to me. We have been using the DeerCreek, Dick Creek, Timber Creek, and areas on the wood-river for snowmobiling for the past 11 to 12 years. For the most part this is an area used mostly by local people and is not heavily used at any time. It seems that the Game & Fish Dept. are concerned about the harassment of wildlife by the snowmobile. If this is true then this is an enforcement problem and does not require closure to the area, skiers and snowshoing can be as big a concern to wildlife harassment as the snowmachine if left unchecked, people do the harassment not the machines or the vehicles.

If there is adequate snow for snowmobiling most likely the elk are not in that area. The elk have always moved down lower to less snow covered areas, most often on to private land next to the Forest land. The elk remaining on the Forest land are for the most part on the south slopes where the snow goes off, or on the ridge tops where the wind clears the snow, these areas are not suitable for snowmobiling anyway. I see no justification for restricting the snowmobiler. The Game Dept. tells us that the elk are on the increase in these areas and that the area will not support these numbers so we need to harvest more elk. This would lead me to believe that we are not disrupting their normal habits.

In this area on about any given day it can be determined who is using the area for winter recreation. Then if there be a problem with the wildlife let the authorities do their job.

For us in Meeteetse this is a very special country and we certainly do not want to destroy it or loose the use of it. If we were to loose the recreational use of the areas we would have to travel distances of one hundred plus miles to get to another snowmobile area. I also believe that we native people of this area are not going to let these areas deteriorate because of harassment of the Game or distruction of the land, it's our obligation to report these violitions.

1 28-1 Closures of areas to motorized vehicles is due to the impacts of those vehicles on wildlife during the period they are on winter range and/or are occupying areas used for birthing. The impact during these periods on wildlife is documented and supported by research and a number of environmental analyses done on this Forest over the last 5 years. The philosophy of the plan is to provide for production of noncommodity values such as high quality wildlife habitat. Closure of these areas during the occupied times is a means for accomplishing this.

Comment 28

FPD-28-P-L-C
Proj. No. [illegible]

In an open winter when vehicles are allowed to travel this is also an area of other types of recreation such as winter outings, wood cutting , and just being able to drive thru and enjoy the wildlife and the scenery when you want to and not at some predetermined time that would be set out in this management plan. These enjoyments have been a way of life for most all of us here in the Meeteetse area.

The management of these areas have been working so well for many years, it seems odd that a few newcomers in our federal and state agencies should come in and impose changes that really can not be justified.

Thank you for taking the time to read and consider the thoughts and comments of other in the community, also for making it possable for us to be a part of the decision making before it becomes a law that will be hard to live with.

Byron B Bennett
P.O. Box 274
Meeteetse, Wyo.

Comment 29

Forest Service Response

RECEIVED SEP 1 3 1985

FPD - 21 - W - L - C
Proj. No. Orig Type Act.

Forest Supervisor
Shoshone National Forest
P.O. Box 2140
Cody, WY 82414

834 So. Fifth Street
Greybull, WY 82426
September 16, 1985

Dear Steve:

I have reviewed parts of the draft Environmental Impact Statement, the draft Land and Resource Management Plan for the Shoshone National Forest, and the summary of these documents, and would like to give you my comments on them. I concentrated my review on the Plan,especially on the Management Direction in Chapter III, and on Appendix J, Forest Plan Detail. I also concentrated on analysis areas within the Greybull Ranger District, since that is the area I am most familiar with. I would like to emphasize that these comments represent only my personal opinion.

Overall, I believe the Plan shows a lot of thought and work, and is well-written. It should be helpful in guiding the future management of the Shoshone National Forest, and in helping the public to understand that management. The preferred alternative appears to be the one that will best serve the most people. The Plan seems to be providing for doing everything for everybody. This is a very commendable goal, but I doubt if it is possible to meet all the projected outputs and objectives listed. In particular, I feel that some of the projections in Table II-5 are unrealistic when coupled with the other projections in the table, and while still maintaining a quality environment. For example, the table projects a large increase in the domestic livestock grazing permitted by the year 2001, even though this is a "non-commodity"alternative.

1

29-1 Restrictions are included in the Plan to insure that wildlife and other natural resources are adequately protected during oil and gas exploration. Grazing will be managed at a level compatible with wildlife and range objectives, and at a level compatible with grizzly objectives, which is ultimate recovery and delisting.

I would like to see the plan assign a range prescription to some of the analysis areas. I believe this would be compatible with the selected alternative, and would promote greater range improvement more quickly than under other prescriptions. When reviewing the forest direction, and the wilderness prescriptions, I find that heavy grazing will be allowed in the wilderness allotments. I would like to see this limited, particularly in 8A and 8B areas. Even the 3B prescription is more restrictive than 8.

2

29-2 There is no grazing in 8A areas; grazing in 8B areas must meet standard and guidelines for utilization as shown in Wilderness General direction and Management Area 8B (Forest Plan).

Comment 29

FPD - 87 - W - L - C
Proj. No. Orig Type Affil

I like the inclusion of Appendix J in the Plan. I think it adds a lot to the usefulness and understandability of the planning effort. However, some of the general descriptions in this Appendix don't emphasize the same resources that the prescriptions assigned to those analysis areas emphasize. In the case of conflict, which wi'l govern? Some of the figures or statistics in Appendix J also appear to need some revision and/or correction before the final Plan is printed. I discussed these with the District Ranger at Meeteetse.

I also like the detail in which outfitter-guide camps were planned and discussed in this Appendix. The capacity for outfitters and guides is indeterminate in many other areas.

Thank you for allowing me to express my opinions, and for considering them.

Sincerely,

Nancy R. F. Feakes

Nancy R. F. Feakes

RECEIVED SEP 18 1985

FPD - 30 - F - L - C
Proj. No. Orig Typo Affil

9/6/85

Dear Sirs,

Regarding your draft 50 year plan; I would very much like to congratulate you on your Clarks Fork river management plan. I, too, would like to see it designated a wild & scenic river. However, I would like to encourage you to request an extension of the formal protection period for this area, so you will have a chance to manage it according to your plan. It would be a shame to have the Clarks Fork spoiled before it is given official protection. 1

Generally speaking I am not in favor of increasing timber harvest at all, but regardless of production levels, I would like to request all resulting roads be obliterated instead of just closed to the public. Logged areas that are returned to roadless status (such as Table Mtn. on Notch Fork) seem to be more in line with past management of the Shoshone Natl. Forest than your current proposal. 2

In particular I am against logging and roading in the Green Creek area (Table Mtn. timber sale scheduled for FY 86). 3

30-1 The Proposed Plan incorrectly states that we can apply for an extension of the protection period for the River. It is contingent upon an act of Congress to protect the River either by including it in the Wild and Scenic River System or by providing additional temporary protection. It is uncertain at this point whether the Clarks Fork of the Yellowstone River will become a part of the National Wild and Scenic Rivers system. The Forest Service and the Administration are in favor of the River's inclusion. Management activities that are within the discretion of the Forest Service will be designed to maintain the River's eligibility. Other activities that are presently within the discretion of agencies such as BLM (minerals) or Federal Energy Regulatory Commission (hydropower development) could affect eligibility characteristics of the Clarks Fork. In the event such developments are proposed, we would recommend denial to the appropriate agency, until Congress acts. See also response to comment 97-1a.

30-2 Timber harvest levels in the Forest Plan have remained approximately at the level of the proposed Forest Plan. The number of acres proposed for treatment has been reduced. This reduction in acreage reflects less emphasis on steeper, less productive areas (primarily stocked with lodgepole pine) and more emphasis on areas with higher productivity. Harvest levels have been established according to the economic viability of individual areas. Forest standards and guidelines are established which will insure that timber sales will not have adverse effects on wildlife, recreation, water, scenic beauty or other resources.

30-3 The Forest Plan shows no extensive timber sales in the Blackwater Creek and Green Creek area. During the first decade the District plans to sell approximately 200 MBF of small Ranger Sales District-wide consisting of post and poles, fuelwood, thinning, house logs, salvage and personal use Christmas trees. The sales in the Blackwater and Green Creek areas will utilize the existing road systems and skid trails. No road construction is anticipated in the first decade.

Comment 30

Forest Service Response

FPD - 30 - P - b - C
Proj. No. Orig Type Affil

In August 1972, and again in August 1983, heavy rains caused extensive flash flood damage to the Green Creek county road. These floods also tore up private property & gouged out the creek bottom. In 1983 Hansen Murray almost lost his basement & home, did loose his garden & part of his corral. He had to hire a back hoe to put the creek back in its channel. From this it is easy to see that Green Creek is subject to flash flooding. Two additional miles of road, & 400,000 board feet of timber harvested, upstream from where the flooding has been worst in the past, will obviously not help this flood problem. I sincerely hope you will abandon the proposed Table Mtn timber sale & therefore not increase the flood risk to private land owners in the Green Creek area.

I would also like to see the Trout Creek area remain unroaded. But if you have to harvest timber there, please obliterate all logging roads when the harvest is done.

Sincerely,

Catterton
159 Green Creek
Cody, Wy

4

30-4 In the Forest Plan there are no timber sales planned in the Trout Peak area in the first decade.

Comment 31

RECEIVED SEP 18 1985 FPD - 31 - W - L - G September 10, 1985

Dear Sirs,

I wish to express my feelings regarding the Shoshone Forest Management Plan. My main concerns are that the resources of the forest are preserved and not spoiled in the rush to develop them. Specifically I feel it is of the utmost importance to preserve grizzly bear habitat whether it is within the boundaries of designated wilderness or not. Shoshone Forest by it's proximity to Yellowstone Park makes it different from most units in the National Forest System. The idea of preserving entire ecosystems regardless of the political boundaries is an idea whose time has come. Don't get me wrong, I am not strictly against timber sales or other development as long as it is compatible with resource protection or the land is capable of being restored to natural state. Timber sales and harvests can be accomplished in a manner that can actually be beneficial to wildlife and the ecosystem. However I don't like to see this angle used to explain large clearcuts in pristine areas where logging roads increase access and also increase opportunities for poachers. I also would like some of the lands not declared wilderness under the Wyoming Wilderness Act to still be managed as wilderness. The Shoshone Forest is big enough that I feel that it can provide plenty of timber and recreation opportunities while still having full protection for the areas in which grizzly bears occur. Under the Endangered Species Act the Shoshone Nat'l Forest has a legal obligation to protect and if necessary enhance grizzly habitat. Oil and natural gas drilling has had a known effect on grizzlies in Northern Montana. I feel it is highly likely the same is true on Wyoming grizzly bears. In short, there is a hell of a lot of wildlands on the Shoshone that protect elk, bear, sheep, and many other species. I feel you folks know where they are. Steve Mealey has been impressive as the Shoshone Forest Supervisor. I wish the rest of the forest system were as lucky to have as fair an individual at the helm. I hope the bear can make it. It won't without the Shoshone on it's side. Good luck and thanks.

1

2

3

Sincerely, Michael G. Bader

Michael G. Bader

Michael G. Bader
Canyon Ranger Station
Yellowstone National Park, Wyoming
82190

Forest Service Response

31-1 See response to comment 24-1. Crucial preferred winter ranges were developed jointly with Wyoming Game and Fish Department. For definition of preferred winter range, see DEIS, Glossary, pages 7-6.

31-2 The Shoshone National Forest is 57 percent wilderness. The Wyoming Wilderness Act of 1984 specifically mentions release of lands not designated as wilderness for multiple use, specifically condemns the concept of nonwilderness buffers around designated wilderness, and states that lands not designated as wilderness need not be managed to preserve wilderness character. Many of the nonwilderness areas are protected from development because of being critical for wildlife, unproductive for wood fiber production, or critical for visual corridors. Regardless of entry into a few of the many remaining roadless areas, the Forest will remain overwhelmingly unroaded and more or less undeveloped. Our charter is to manage for multiple-use, not just preservation.

The uses of the Forest other than preservation and nonmotorized recreation, such as wood fiber production, domestic livestock production, oil and gas development, developed recreation, and motorized recreation, have been provided for to the extent possible given a stewardship objective. The Forest Service feels that these more commodity-oriented uses have been provided for in balance with the noncommodity uses in the preferred alternative.

31-3 The decision to recommend lease denial in Situation I is supported by two environmental analysis documents. In both cases, there were no public comments on these documents which opposed this decision. These documents are the DEIS for Oil and Gas Exploration and Leasing within the Washakie Wilderness and the 1982 Environmental Assessment of Oil and Gas Operations in Grizzly Bear Situation I and II. Further, the decision was supported by the U.S. Fish and Wildlife Service in their formal opinions written for these documents. The U.S. Fish and Wildlife Service recently issued a "no jeopardy opinion" on the Forest Plan. This opinion was partially based on lease denial on Situation I lands.

The decision in the Plan does not constitute a withdrawal for it is a temporary ban on leasing. If Situation I lands were withdrawn, leasing following recovery of the bear would require negation of the withdrawal.

The Plan selected the option of requiring no-lease as opposed to withdrawal because in the event of a recovered grizzly bear population, leasing would again be considered. Further, the cumulative effects studies currently underway might help us understand ways in which oil and gas activities may be accomplished with no effect on the Grizzly. Once the cumulative effects can be predicted, then the Interagency Coordinator Committee could consider the general opening of Grizzly Situations I to leasing and formally consult with U.S. Fish and Wildlife Service.

There are many other resource restrictions in Grizzly Bear Situation I habitat. Timber operations as well as recreational opportunities are limited in these areas.

Comment 32

Forest Service Response

RECEIVED SEP 2 3 1985

FPD-32-0-4-C
Proj. No. Orig Type Affil

Bucky and Patti Harris
P. O. Box 267
Jackson, MI 49204

September 16, 1985

Mr. Steve Mealey
Forest Supervisor
P. O. Box 2140
Cody, Wyoming 82414

RE: Proposed Forest Plan

Dear Mr. Mealey:

As landowners and permittees on the Table Mountain and Bench Allotment, we have an interest in the proposed Land And Rescue Management Plan. In general, we endorse the Preferred Alternative, especially with the goal of providing "for grazing of livestock to maintain dependent existing industry". However, because of our familiarity with the above mentioned areas, we have serious concerns with some specific proposals contained in this plan that could have eventual adverse impact. We would like you to consider these concerns as you develop the final Forest Plan document.

I. Table Mountain
   A. Appendix J, Page 37, "Land Uses"
   "A three quarter mile trail right-of-way will be considered for recreation and administrative access through the Wright Place."

      1. As owners of the Wright Place, we have always allowed Forest Service personnel access through our property. We will continue to do so. A right-of-way is not necessary for this.

      2. There are many beautiful accesses and trails to the Clarksfork Canyon from all directions that do not require having to go through our property.

      3. To allow the public a right-of-way through our property would result in loss of privacy, increased risk of vandalism, and immense liability to us for personal injury.

      4. Because of the geographic setting of our land in the Canyon, public access would greatly disrupt our lifestyle and ranching operations.

      5. To allow public access would decrease the property value of the Wright Place.

1 32-1 A right-of-way thru the Wright Ranch will not be pursued unless the official route of the Nez Perce Trail crosses that property.

Comment 32

Forest Service Response

FPD- 32- D- 1- 0
Proj. No. Orig Type Area

B. Appendix J, Page 37, "Timber" (Table Mountain)
"Timber Management costs include 7 miles of road construction in the first decade, 1 miles in the second decade and one mile of road in each of the fourth and fifth decade."

1. Is it not possible to meet the local demand for timber from areas where roads are already in existence, or at least where less road construction would be necessary?

2. The Table Mountain area has become a habitat for an increasing number of wildlife species, due in great part to the fact that there are no roads and no easy access to this area, and the wild life are not constantly being stirred up by motorized vehicles.

3. The hikers, fishermen, back-packers, and hunters who prefer this area do so because of the absence of roads. It attracts the more serious sports person and recreationists. There are many surrounding areas nearby with roads already in existence. These include Lake Creek, Russell Creek, Deadman, Lodge Pole, Reef Creek and Sunlight Basin.

4. The fact that a road is open only for timber use does not mean that it will not be used otherwise. I do not believe the Forest Service has the money or the manpower to control the use of a timber road solely for that purpose. Violations now occur repeatedly on roads with regulated usage. An example of this is the Morrison Jeep Trail. Many roads originally put in for timber use are now used constantly by large motorized vehicles. An example of this are the timber roads on Reef Creek.

5. Once a road is put in, the scar is there forever. I am not aware of any timber road in our area that has been successfully obliterated. Unless there develops a known shortage of timber at the local level, hold off on construction that will have lifetime consequences for the forest.

6. Unless you monitor the timber cutting, you can end up not only having a very ugly visual blemish on the forest, but also having tremendous ecological destruction. An example of this is the clear cut timber area on the Reef Creek Trail.

7. Table Mountain is a Situation I Grizzly Bear Habitat and timber roads will result in an increase in man/grizzly contact. Why increase the potential for conflict between man and the grizzly that will inevitably result from man's increased usage.

II. Bench Allotment
A. Appendix J, Pages 17-19, "Range"
"It is managed under a modified open season long grazing system for cattle, with ten percent of the available forage reserved for wildlife outside of crucial preferred winter range."

2

32-2 Further economic analysis has shown that timber activity from the Table Mountain area during the first decade would not be viable; therefore, all timber harvest has been removed from the first decade schedule. The Plan has been revised to reflect this change.

Comment 32

FPD 32- 0 - L - C
Proj. No. Orig. Type Cell

Mr. Steve Mealey Page 3 September 16, 1985

1. We feel that the specific delineation of the preferred winter range in the area above and including the Switchback Ranch is inaccurate and unrealistic. We feel that the preferred winter range is more general, varies according to the weather situation, and should be included in the 10% wild life forage. To be specific, in a hard winter, the wild game will not feed on the area known as the airport (which is included in your map of the preferred winter range study). They instead feed almost exclusively in our pastures, behind our cattle after feeding, and in the lower "breaks" area. Heavy snows, drifting and winds make the feeding in the areas above the ranch undesirable. The elk may be seen sunning on the airport in mid-day, but they do not feed there that much. In an open winter, they feed all over the ridges, not exclusively in the defined area. The most crucial winter range for the deer and elk on the Bench Allotment are our hay pastures, and, depending on weather conditions, the "breaks" area.

2. Although the exact number of elk that the appropriate agencies have determined as representative of using this particular range is not known to us at this time, we feel that the appropriate number should be 200. Only on occasion have sightings of more than 200 been seen (and even then not much more), and in certain years of severe winter weather (example 1978-79) very few elk were seen in that area.

We feel strongly that a 200 head cattle permit is compatible with the wild life that use the Bench Allotment. We feel that we personally contribute to their well being. A conservative estimate would show that in the late fall months the elk eat approximately two/thirds of our pastures. In winter, they consume about one/fourth of the hay we produce. During a hard winter, we probably make a difference in the survival of many elk, at our own expense.

3

III. Grizzly Bear Habitat - Situation I on Table Mountain and surrounding area.
We are specifically concerned with the number of grizzly bears that are coming into this area, with their familiarity with man, and with the ability of the Forest Service and related services to prevent human injuries and fatalities. I refer to the occasions where the grizzly appears to prefer the food that humans provide, and approaches man with no apparent fear.

These grizzlies seem different from the ones who have inhabited our areas in the past, in that the former bears kept their distance from man and his surroundings. Today, there are grizzlies who actually walk up on porches, or cross lawns right in front of humans with no apparent fear. If these situations continue, we feel it inevitable that a confrontation with a human and a grizzly will take place and a serious human injury is likely.

4

Forest Service Response

32-3 Crucial preferred winter ranges were identified jointly with the Wyoming Game and Fish Department. For definition of crucial preferred winter range see EIS, Chapter VII, Glossary. The Wyoming Game and Fish Department has temporarily lowered their objective for elk in this area to 200 head.

Comment 32

Forest Service Response

FPD - 32 - 0 - L - C
Proj. No. Orig Type Appl

We also see evidence that the grizzly is hungry. In July, 1985, a grizzly killed a 700 lb. yearling cow on deeded land just off the highway, and had it eaten within 24 hours. Could it be that there are too many bears (I include non-grizzlies also) for the food available? Is a potentially dangerous situation developing? We have lived with the grizzly bears in our area for thirty years, and do not want to see them become extinct. However, we do not want to see this situation get out of control. We wonder where the line is drawn between protecting our endangered species and protecting man in his own home or on his own land. 4

32-4 Upon recovery of the grizzly bear, the animal and its habitat is managed in cooperation with the Wyoming Game and Fish Department. Appropriate restrictions on activities would be similar to those of elk, bighorn sheep, etc., for protecting their habitat needs and in preventing human-grizzly conflicts.

The concerns we have expressed in this letter are based on many years of living in the Table Mountain-Bench area. Our long standing commitment toward the preservation of the natural wilderness and the existing wild life habitat has been very real, and our interest in maintaining the economic viability of a ranching operation is in keeping with the goals of the Forest Plan. We hope you will consider these concerns in formulating the final document.

Sincerely,

Bucky and Patti Harris

Bucky and Patti Harris
P. O. Box 267
Jackson, MI 49204

cc: Mr. Bob Hammond
Mr. Chuck Kienast
Mr. Mac Black

Comment 33

RECEIVED SEP 2 0 1985

FPD 33 P L C
Proj.

Arne G. Sandberg
418-Rd.6FU
Cody, WY 82414

Stephen Mealey, Forest Supervisor
Shoshone National Forest
Cody, Wyoming

Subject: Comments on the Management Plan for the Shoshone National Forest

As a general comment, the Plan seems well concieved, extensive, and well prepared. The idea of building from the micro level (the mini-plan) to the macro level, as described in the scoping process meetings, seems to provide a mechanism for an even handed treatment of all areas; rather than trying to impose an overall policy, it sees if the sum of the individual objectives fits the overall policy.

One does wonder about the overall objectives(Planning Problems);they seem to be very short term only. Do they equate to the long term objective of managing the Forest in the best interest of the people? Also,the Plan recognizes relationships with state and local agencies, but there is little on how this plan is coordinated into a larger planning unit, the Ecosystem. There is a recognition the the Shoshone Forest borders the National Park, and there is a recognition of the need to integrate, to coordinate, some activities, such as the Grizzly management; but, there isn't any clear overall coordination of long term planning. The idea of buffering the area around the Park, by coordinating the designation of "sensitive areas"(asdesc ibed in the Plan), would seem an appropriate means of starting the larger planning. 1

I was pleased to note the plan to perform Air and Water quality sampling. The position on Scenic Rivers seems excellent.

It would be desireable to have some cap on mineral development by area, so that there wouldn'tbe wholesale displacement of all other interests(particularly Game)from an area to serve a single interest. 2

It is noted that all alternatives fail to meet Elk population objectives; Wetlands development isn' t cited as an objective; there doesn't seem to be any comments on how to handle Buffalo, if they wander out of the Park, as they have in Montana. 3

I would like to see more emphasis on destroying, or closing, timbering roads when not in use for their intended purpose; the use of controlled burns for habitat improvement;the use of scouring flows in stream beds to improve fish habitat, where flows can be regulated; the rotation of Grazing 4 5 6

Forest Service Response

33-1 See response to comment 24-1 and 44-46.

33-2 The Errata sheet to Proposed Plan Appendix K and Appendix K of the Forest Plan outlines the process for developing lease recommendations. Lease recommendations consist of a set of stipulations and recommended operating procedures which are deemed as possibly necessary to meet the objectives of the Plan for other resources. Actual exploration and development proposals require additional environmental analysis and determination of cumulative effects that could result in a cap on activities within a given area. This determination would include wildlife population objectives within a herd unit, or other resource objectives affected by incremental development through time.

33-3 See response to comment 8-5. Management of Buffalo as well as other resident wildlife is the responsibility of the Wyoming Game and Fish Department. The Forest Service will cooperate as necessary.

33-4 In response to numerous concerns, the number of acres managed for timber harvest and the resultant amount of roads has been reduced in the final Plan. In the next fifty years, the Plan projects only eighty miles of new road which will be open to the public. There is projected 120 miles of existing road which will be improved and remain open to the public. An additional 150 miles of new road, and 255 miles of reconstructed existing roads are projected to be closed to the public within the 50 year period. Road construction and reconstruction figures have been corrected. See also response to comments 182-5, 33-9, 80-5, and 44-46.

33-5 The Plan proposed control burning for wildlife habitat improvement.

33-6 The overall objective for riparian areas is to maintain or enhance riparian and aquatic-dependent resources. This objective, stated differently, is the maintenance of favorable conditions of flow. Our standards and guidelines for management are structured to prevent increases in flow that would tend to degrade or scour stream channels. This is the intent of developing sediment yield thresholds.

Improvements in fish habitat can be achieved more efficiently and demonstrated more effectively by direct structural, mechanical, and vegetative improvements in riparian areas. This holds particularly true in aggraded streams, very common on the Forest, which are alternately scoured and filled within a braided channel system.

Comment 33

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Proj Orig Type Affil

on a long term basis to allow the recovery, or improvement, of grazing lands. 7

On which of the alternatives is the most desireable, the preferred or the reduced budget seems best to me; depending on specific objectives I note that none of the alternatives have any effect on mineral development; it seems to be outside the scope of the Plan. Fifty years to the next revision seems like a long time. 8 9

On the whole, the Plan is a good statement on how policies will be implemented.

Sincerely,

Arne G. Sandberg

Arne G. Sandberg

P.S. - Steve, I hope this makes sense, I was watching a football game while I typed it - I still haven't heard much about Grizzly [illegible] Jumpling - Arne

Forest Service Response

33-7 This is planned for under Standards and Guidelines and Range Resource improvement section (Chapter III, Forest Plan).

33-8 See response to comment 68-5.

33-9 The focus of the Forest Plan is for the next 10 to 15 years. Revisions of the Plan are mandated within that time frame. Amendments and revisions of the Plan will be made periodically within this time frame as conditions warrent including new information and/or major shifts in issues and demands for goods and services. The effects of implementing the Plan and alternatives are projected over 50 years in order to portray the long term consequences of the chosen actions and alternatives to it. See also response to comment 70-11.

Comment 34

Forest Service Response

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FPD- 34- P- L- E
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Foundation for North American Wild Sheep

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† Past President

September 18, 1985

Stephen P. Mealey
Supervisor
Shoshone National Forest
Box 2140
Cody, Wyoming 82414

Dear Steve,

Regarding the draft Land and Resource Management Plan for the Shoshone National Forest, the Foundation for North American Wild Sheep (FNAWS) would like to offer these comments. The Foundation recognizes that the Shoshone National Forest provides seasonal or year-long habitats for one of the largest Rocky Mountain bighorn sheep populations, and we commend the U.S. Forest Service on their management history relative to mountain sheep. As proposed in the plan, habitat improvement through vegetative manipulation, reduction of livestock grazing on critical bighorn sheep ranges, and seasonal restrictions and stipulations on mineral exploration will do much to maintain the integrity of these wild sheep herds. However, there are some additional management suggestions which the Foundation would like to see implemented in the Forest Plan.

1) Important bighorn sheep seasonal ranges (lambing areas, winter ranges, etc.) require special consideration. For example, the Dunn Creek/Jim Mountain, upper South Fork, and Eleanor/Warhouse winter ranges support large numbers of sheep. Habitat conditions and forage quality need to be maintained or enhanced to protect these wintering concentrations.

Existing livestock allotments on these and other critical winter ranges should be closely evaluated, to identify conflicts, and to develop and implement solutions to minimize those conflicts. Structural and range improvements would achieve better distribution of livestock, thus reserving adequate forage for wintering sheep. If utilization studies indicate a wildlife/livestock conflict, modification or reduction of livestock grazing levels would be appropriate. 1

2) Mineral exploration and development within bighorn sheep ranges presents special problems. Because 2

34-1 Competition for existing forage in CPWR will be resolved in favor or wildlife. See individual analysis areas in Appendix J of the Forest Plan.

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Pro [illegible]

mountain sheep are highly traditional in their seasonal movements and habitat use, extreme care must be taken to ensure that important habitats are not lost or rendered unavailable to sheep. On critical winter ranges, FNAWS encourages "no-lease" or "lease-with-no-surface-occupancy" recommendations for proposed oil and gas development. More stringent operating plans for oil and gas activity in sensitive bighorn sheep areas need to be developed. This might include dependence on airlift or non-motorized access, buried pumps and pipelines, electronic surveillance of well-head production, and off-site collection of any oil and/or gas produced. Conventional methods (road access, pumpjacks, etc.) for producing oil/gas will not be adequate to guarantee bighorn sheep and other wildlife are not significantly impacted.

In the DEIS with the Plan, it was stated (p. II-86) ..."mineral development will cause a direct loss of wildlife habitat on the Forest. This will not be a long-term effect, since measures will be taken to mitigate the loss of habitat following mining." If mineral development causes a loss of habitat for bighorn sheep and other wildlife, the Foundation recommends mitigation of habitat loss before and during mineral operations, not after the fact. Without concurrent off-site mitigation, animals displaced by industrial activity may be lost from the population due to a reduction in carrying capacity.

3) As outlined in the U.S. Forest Service Region 2 Bighorn Sheep Initiative, FNAWS encourages the Forest Service to design and implement an aggressive habitat management program for mountain sheep on the Shoshone National Forest. Much of the bighorn sheep winter range on the northern half of the forest, as well as on the Whiskey Basin Management Unit, is in "less-than-optimal" condition due to encroachment of conifers and juniper. Restricted visibility due to conifer and/or shrub canopies may lead to abandonment of seasonal ranges and travel corridors. Enhancement of mountain sheep winter ranges through prescribed burning is an effective management tool long supported by the Foundation.

Adding to the urgency of declining habitat quality on winter range, a large proportion of the sheep in the northern half of the forest is infected with scabies. This is potentially a very serious threat to Absaroka sheep herds, and a dieoff may be precipitated through accelerated habitat loss and increased stress from human disturbance (recreational, industrial, etc.). An active habitat management program for sheep, combined with prudent restriction on development in occupied sheep ranges, may do much to minimize or delay a scabies outbreak and the consequent reduction in sheep numbers.

As always, the Foundation for North American Wild Sheep stands ready to assist federal and state agencies in

2 34-2 We agree that mineral exploration and development on bighorn sheep ranges present special problems. The Errata Sheet for Appendix K of the Plan outlines a process for analysis of leasing proposals that may generate more issues and concerns than were dealt with in the Forest Plan. An example of this type of process is currently being done on the South Fork lease group. When bighorn sheep winter range is involved in this group we will be exploring a full range of alternatives and environmental consequences associated with them in much more detail than is apparent in the Forest Plan. Mitigation measures and their timing will be explored in this analysis, and other analysis that are required after the plan is in effect. Appendix K of the Plan also covers many of the operating plan recommendations you have described under the heading "Crucial Preferred Winter Range and Wildlife Unique Class". Other operating recommendations can be added to meet site-specific requirements. The errata sheet has been incorporated into Appendix K of the Forest Plan.

Comment 34

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Proj. No. Or'g Type Ltr(s)

developing promoting, and implementing sound management approaches to protect wild sheep populations. Please contact us if we can be of further assistance.

Sincerely,

Ted Bryant

Ted Bryant
Director of Administration

TB/dls

Comment 35

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Proj. No. Orig Type Affil

Mrs. Robert T. Bucknam
Box 1050
Dubois, Wyoming 82513

September 18, 1985

Stephen P. Mealey
Forest Supervisor
Shoshone National Forest
Box 2140
Cody, WY 82414

Dear Mr. Mealey,

While I realize the importance of insect control and the economical aspects in management of the forests, I disagree with parts of the Forest Service ~~Proposed~~ Proposed Plan.

The timber harvest volumes planned are much too high for the multiple use concept. Demands to accommodate local economies should not take priority over wildlife and recreation. Since I live in Dubois and am familiar with the Dinwoir and Union Pass areas, I feel strongly about the possibility 1

Forest Service Response

35-1 Timber harvest levels in the Forest Plan have remained approximately at the level of the proposed Forest Plan. The number of acres proposed for treatment has been reduced. This reduction in acreage reflects less emphasis on steeper, less productive areas (primarily stocked with lodgepole pine) and more emphasis on areas with higher productivity. Harvest levels have been established according to the economic viability of individual areas. Forest standards and guidelines are established which will insure that timber sales will not have adverse effects on wildlife, recreation, water, scenic beauty or other resources.

Comment 35

of road building and logging &c. in these places.

We need to use the Union Pass road to Pinedale to make timbering economically feasible emphasized the fact that logging on a large scale in an area with a slow rate of reproduction is shortsighted. I cannot agree with the Forest Plan to continue to approve maintaining its present level of timber harvest.

Hunting, fishing and just the natural beauty of the area are other attractions benefiting local and state economy but require mature stands of timber which are fast disappearing here. The logging industry already monopolizes the Union Pass road making it unsafe for other vehicles and detracts from many forms of recreation. Recent cut over areas in the Double Cabins on the Wiggins Fork road make me skeptical of future plans for visual quality

1

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Proj. No. Or

Mrs. Robert D. Bucknam
Box 1050
Dubois, Wyoming 82513

in meeting the volume expected.

I major elk migration route between the East Fork winter range and Yellowstone would be effected by logging in the Dunoir area. I am against further road-building and logging on the west side of Dunoir. 2

During the meeting in Dubois concerning the Forest Service Plan, it was mentioned that the plan contained provisions for acquiring 7 road easements. One easement over the existing Dunoir road is not one of the 7. Since the Forest Service land on the east side of Dunoir is inaccessible to the public I believe that the plan should provide for an easement over the existing road even though 3

35-2 In the 1984 Wyoming Wilderness Act, Congress directed that nonselected roadless areas be released for multiple use purposes, and that "buffer areas" were not to be considered adjacent to Wilderness. With this legal direction in mind, some timber sales and the accompanying roads have been scheduled in roadless areas, while other currently roadless areas have not been scheduled. See also rsponse to comments 182-5 and 44-46.

35-3 It is felt that current road access to the Dunior Special Management Area through the Long Creek drainage is adequate to serve the publics' needs. No right-of-way acquisition up the Dunoir Valley itself is contemplated.

best copy available

Comment 35

condemnation may be required 3

I also believe that all oil and gas leasing bordering on wilderness areas should be withdrawn. 4
There should be a buffer zone to protect the sensitive qualities of these areas.

I hope that the above comments will be reflected in the Forest Service plan.

Sincerely,
Virginia Buchanan

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CODY, WYOMING

Forest Service Response

35-4 There is no legal mandate or precedent for providing "no lease" buffer zones as you suggest. Rather, congressional intent runs in opposition to the establishment of wilderness buffers, as stated in the Wyoming Wilderness Act of 1984.

EPD-36-P-1-13
Proj. No. Orig Typo Affil

September 10, 1985

Mr. Stephen P. Mealey
Forest Supervisor
P.O. Box 2140
Cody, WY 82414

Dear Mr. Mealey:

I am writing in reference to the Forest Plan. My wife and I operate Elk Creek Ranch in Sunlight Valley. Lyle Hancock delivered a copy of the Plan to me and I appreciate the opportunity to make several comments.

I should start by announcing my prejudices. We operate our ranch for children, with significant use of the forest for packtrips and backpacks. Naturally we favor a recreational emphasis in planning the future of the Shoshone. I believe, however, that the issue is more fundamental than simple convenience. The greatest resource our part of Wyoming holds is the country. The tourist business is vital to the economic health of many communities. Dude and guest operations contribute significantly to that health. This resource can last forever, unlike oil, gas, and mineral deposits. The Forest Plan makes a point of noting the lumber industry, even though its numbers are very small. I don't see the same recognition of the guest ranch industry, even though our numbers are great.

I would generally favor Alternative C over Alternative D for the reasons given above. I do believe in multiple use. I do think that the Forest Service has generally done an admirable job of mediating the impact of the varying multiple users on the forest. But I have also hiked to the top of Stinkingwater Peak and seen what mining equipment can do and I have ridden the Trout Peak Trail and seen the impact of a herd of cattle. Our own groups have their own impacts despite what I consider to be good training and intentions. The pressures will get greater and I believe the Forest Service's first priority within the multiple use framework should be the preservation of the Forest's most valuable resource--the country. In the long run, the 'net public benefit' would be maximized with that approach.

Several specific comments are perhaps worthwhile. In reference to the Forest Plan Detail:

1. I urge the Forest Service to continue to work for the Wild and Scenic designation for the Clarksfork River.
2. I cannot imagine how any extractive or hydroelectric project can do anything up compromise what is essential to the Forest. Only a very significant return in a situation of critical need could justify such a price.

1

36-1 The Proposed Plan incorrectly states that we can apply for an extension of the protection period for the River. It is contingent upon an act of Congress to protect the River either by including it in the Wild and Scenic River System or by providing additional temporary protection. It is uncertain at this point whether the Clarks Fork of the Yellowstone River will become a part of the National Wild and Scenic Rivers system. The Forest Service and the Administration are in favor of the River's inclusion. Management activities that are within the discretion of the Forest Service will be designed to maintain the River's eligibility. Other activities that are presently within the discretion of agencies such as BLM (minerals) or Federal Energy Regulatory Commission (hydropower development) could affect eligibility characteristics of the Clarks Fork. In the event such developments are proposed, we would recommend denial to the appropriate agency, until Congress acts. See also response to comment 97-1a.

Comment 36

Forest Service Response

FPD - 36 - P - L - B
Proj. No. Orig Type Area

3. I was encouraged to read that all roads contructed for timber operations will be closed when the work is done. I might be well worth the Forest Service's time to look at the fire road which crosses from Beam Gulch to upper Elk Creek. The scar is deep and stands out from miles away.
4. The grazing permits around Trout Peak need to be re-examined. I believe that the Forest Service has attempted to restrict grazing in that area but cattle still cover the ground with ease. I have seen cattle in Trout Creek Basin on the North Fork side and on the northern slopes of Trout Peak on the Sunlight side. When they are there the elk are not.

In reference to Alternative D Map for the Northern Absaroka:

1. 2A includes a corridor along Elk Creek. 2A calls for "semi-primitive motorized recreation opportunities." No road exists up Elk Creek until one reaches the fire road. I believe that the area is off-limits to motorized travel. I would certainly argue against any change in that approach.
2. 3A and 5A includes the area around Lake Mountain to the northwest of Elk Creek. I would repeat and emphasize the comment on motorized recreational opportunities. It is also worth noting that that area includes a small but year-round elk population. It is well worth protecting; in fact, we refuse to allow any rides or hikes into it.

I have the feeling that I should have read other parts of the Plan and responded more thoroughly. My failure to do so reflects in part my respect for the work the Forest Service has done and for the obvious care with which this report was prepared. I would emphasize again that my major concern has to do with the lack of priority given to preserving the country as our most important resource.

Sincerely,

Hap Ridgway

Hap Ridgway
P.O. 1476
Cody, WY 82414

2

36-2 It is recognized that additional administrative management relative to grazing may be necessary in this area.

3

36-3 The area is grizzly bear Management Situation II. This area was not recommended for wilderness designation in RARE II. The area is and has been open to motorized use of trails. Although the area receives little use of this kind, it is one of the few opportunities for this type of recreation on the District.

Comment 37

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W.J. Conway, Los Angeles
Raymond M. Ingram, Houston
James R. Voisinet, Dallas
Milton H. Ward, New York
Renold D. Thompson, Cleveland
K.E. McElhattan, Oakdale PA
G.F. Joklik, Salt Lake City
Ian MacGregor, Greenwich *
N.T. Camicia, Greenwich *

* Immediate Past Chairman
* Honorary

September 19, 1985

Mr. Stephen P. Mealey, Forest Supervisor
Shoshone National Forest
P.O. Box 2140
Cody, Wyoming 82414

Dear Mr. Mealey:

This letter constitutes the comments of the American Mining Congress (AMC) on the draft Environmental Impact Statement (EIS) and proposed Land and Resource Management Plan for the Shoshone National Forest.

The American Mining Congress is an industry association that encompasses: (1) producers of most of America's metals, coal and industrial and agricultural minerals; (2) manufacturers of mining and mineral processing machinery, equipment and supplies; and (3) engineering and consulting firms and financial institutions that serve the mining industry.

We have difficulty in finding that the Shoshone National Forest plan sufficiently conforms to the letter and spirit of the National Forest Management Act of 1976 (NFMA), Council of Environmental Quality (CEQ) regulations and guidelines, and U.S. Forest Service (USFS) regulations. The disaccord with the cited laws, regulations, and guidelines is occassioned by the fact that nearly 57 percent of the Forest, currently designated as wilderness, is not subject to those elements of the planning process involving inventory data and information collection, analysis of the management situation, formulation of alternatives, evaluation of alternative requirements and subsequently the selection of an alternative.

More detailed rationale follow:

Section 6(g)(2)(a) of NFMA requires the identification of the suitability of lands for resource management. For the wilderness areas, we are unable to find an analysis of the suitability of these areas for resource management, e.g. timber, wildlife, minerals. 1

Continued...

Forest Service Response

37-1 The National Environmental Policy Act of 1969 and its implementing regulations do provide for analysis of alternatives which violate existing law as stated by the commenters. This is generally in application of a general law to a specific area where the benefits and costs of that application have not been considered by decision makers. This is not the case in terms of designated wilderness areas. Each area designated as wilderness was done so on an area by area basis by Congress. They determined, for those areas being designated as wilderness, that there was sufficient information upon which to base a decision and that decision was to designate those areas as parts of the National Wilderness System. This is evidenced by the fact that in cases where they felt there was insufficient information on which to base their decisions, they would designate areas as "study areas" for which they requested further analysis and information. Two such areas are designated on the Forest (the Dunoir Special Management Unit and the Beartooth High Lakes Study Area). During scoping for Forest Planning nationally, regionally and locally, it did not appear appropriate to second guess Congress on their intent. Therefore, it was decided that such analysis was inappropriate unless requested by Congress. Such a request has not been received. Because of these reasons, analysis of "opportunity costs" of existing wilderness areas was not done.

Comment 37

FPD - 37 - 0 - 4 - B
Proj No Orig Type Alt

With reference to CEQ regulations and guidelines, 40 C.F.R. 1502.14 states that "In this section (Alternatives including the proposed action) agencies shall: (c) Include reasonable alternatives not within the jurisdiction of the lead agency."

Inasmuch as nearly 57 percent of the Shoshone National Forest is classified as wilderness, and no alternatives to the present wilderness are included in the forest plan, it seems reasonable that alternatives be provided in the plan that discuss the environmental and economic impacts of lesser portions of the forest being classified as wilderness and boundary changes of current wilderness be considered. A careful reading of Natural Resources Defense Council, Inc. v. Morton (U.S. Court of Appeals, District of Columbia Circuit, No. 71-2031, January 13, 1972) leads to the conclusion that the alternatives suggested here, although requiring legislative action for implementation, are reasonable.

VI-98

Further, Appendix B of Environmental Quality 1981, 12th Annual Report of the Council on Environmental Quality, Nicholas C. Yost, General Counsel, answers questions directly related to this issue:

Q. How many alternatives have to be discussed when there is an infinite number of possible alternatives?

A. For some proposals there may exist a very large or even an infinite number of possible reasonable alternatives. For example, a proposal to designate wilderness areas within a National Forest could be said to involve an infinite number of alternatives from 0 to 100 percent of the forest. When there are potentially a very large number of alternatives, only a reasonable number of examples, covering the full spectrum of alternatives, must be analyzed and compared in the EIS. An appropriate series of alternatives might include dedicating 0, 10, 30, 50, 70, 90 or 100 percent of the Forest to wilderness. What constitutes a reasonable range of alternatives depends on the nature of the proposal and the facts in each case.

1

AMC submits that this answer is indeed applicable in this case, i.e. the discussion on the amount of reasonable wilderness in the Shoshone National Forest requires a careful analysis covering the full spectrum of alternatives.

A further question and answer by Mr. Yost refers directly to this issue:

Q. Must the EIS analyze alternatives outside the jurisdiction or capability of the agency or beyond what Congress has authorized?

A. An alternative that is outside the legal jurisdiction of the lead agency must still be analyzed in the EIS if it is reasonable. Potential conflict with local or federal law

Comment 37

FPD - 37 - 0 - 4 - 6
Proj. No. Orig Type Arrit

does not necessarily render an alternative unreasonable, although such conflicts must be considered. Section 1506.2(d). Alternatives that are outside the scope of what Congress has approved or funded must still be evaluated in the EIS if they are reasonable, because the EIS may serve as the basis for modifying the Congressional approval or funding in light of NEPA's goals and policies. Section 1500.1(a).

AMC suggests that the EIS and plan do not conform with Forest Service regulations. The regulations in question, 36 C F.R. Part 219, explicitly cover wilderness areas. Section 219.2, in part, reads: "The regulations in this subpart apply to the National Forest System, which includes special areas, such as wilderness..."

Section 219.1(b)(2) states that forest planning will be based on the principle, among others, that: "(2) Consideration of the relative values of all renewable resources, including the relationship of nonrenewable resources, such as minerals, to renewable resources."

The lack of inventory of resources on 57 percent of the forest area, as well as no consideration of the relative values of renewable resources or their relationship with minerals on this portion of the forest area, does not follow the letter or intent of the subsection referred to. 1

Section 219.5(a)(4) calls for the interdisciplinary team to develop a broad range of alternatives that identify the benefits and costs of land and resource management. A broad range of alternatives, as expressed in CEQ guidelines, has not been developed, nor have the benefits and costs of land and resource management on a major portion of the forest been identified.

Section 219.11 provides for monitoring and evaluation for determination and evaluation of the effects of management practices. Other than recreation use, campsite condition, and range, the proposed plan (Chapter IV) does not show planned monitoring or evaluation of the renewable or nonrenewable resources on the wilderness portion of the forest.

Further, it is evident that Sections 219.12(e)(1)(ii) and (iii) has not been met for the forest as a whole, i.e. the maximum physical and biological production potentials of significant individual goods and services together with associated costs and benefits, and monetary benchmarks estimating maximum present net value.

One of the fatal flaws of the plan lies in the formulation of alternatives, Section 219.12(f)(1):

Comment 37

FPD - 37 - 0 - L - 13
Proj No. Orig Type Affil

Alternatives shall be distributed between the minimum resource potential and the maximum resource potential to reflect to the extent practicable the full range of major commodity and environmental resources uses and values that could be produced from the forest (emphasis added).

The plan and environmental impact statement do not reflect the full range because they consider only 43 percent of the forest. If the regulations had meant anything less than the full forest acreage in this instance, the regulations would cite the exceptions.

Finally, having based this rationale on the deviations between laws, regulations and directives and the forest plan, we raise the question of equity. Is it equitable to review roadless areas for wilderness suitability and not review wilderness areas for nonwilderness suitability? 1

Based on the laws, regulations and directives herein cited, we request that the forest plan of the Shoshone National Forest be revised so that the collection of inventory data and information, analysis of the management situation, formulation of alternatives, and evaluation of alternatives for the legislatively designated portions of the forest be included in the final EIS and plan.

We appreciate the opportunity to comment.

Sincerely,

Thomas C. Nelson

Thomas C. Nelson
Assistant to the President

RECEIVED SEP 2 4 1985

FPD - 38 - W - 1 - C
Proj. No. Orig Type Appl

23 September 1985
P.O. Box 274
Kaycee, Wyoming 82639

Stephen Mealey
P.O. Box 2140
Cody, Wyoming 82414

Dear Mr. Mealey,

I am writing to you in regards to the proposed Shoshone National Forest Plan. In reviewing the draft I was suprised to notice the increase of roads per square mile of forest - 13.3 miles of road per square mile of forest for the next 50 years. Comparing this to the existing .21 mi/sq mi forest I found the draft plan blatently inconsistent w/ the ideals of protecting wildlife & its habitat. It is my understanding & belief that the proposed increase in new logging roads will adversely affect wildlife, to say nothing of what it would do to decrease the primitive recreational opportunities.

As an instructor for the National Outdoor Leadership School I am familiar w/ the Shoshone forest & know that the proposed increase in logging roads would have a significant negative impact on the primitive areas so essential to the livelihood of NOLS and other outfitters.

Please - restrict timbering to presently roaded areas. Allow wildlife & recreational users full benefit of the unique & beautiful Shoshone National Forest at the same time allowing the small logging companies to operate efficently w/in their capacity.

Thanks for this opportunity to present my viewpoint. Again, no more roads!

Sincerely,
Celia Clark

1 38-1 In response to numerous concerns, the number of acres managed for timber harvest and the resultant amount of roads has been reduced in the final Plan. In the next fifty years, the Plan projects only eighty miles of new road which will be open to the public. There is projected 120 miles of existing road which will be improved and remain open to the public. An additional 150 miles of new road, and 255 miles of reconstructed existing roads are projected to be closed to the public within the 50 year period. Road construction and reconstruction figures have been corrected. See also response to comments 182-5, 33-9, 80-5, and 44-46.

The Forest Plan will guide management over the next 10 to 15 years and will be revised every 15 years or sooner in response to major changes in information or needs of the American public. Projections over 50 years are provided to portray long term consequences only.

2 38-2 As mentioned in other responses, timber harvest levels have been set according to biological and economic factors. When the Forest Service sells timber, the purchaser is determined through competitive bidding processes. See also response to comment 51-5.

Comment 39

Forest Service Response

RECEIVED SEP 2 4 1985

FPD - 39 - F - L - B
Proj. No. Orig Type Affil

WYOMING WOOD PRODUCTS, INC.
Route 63, Box 471
Lander, WY 82520
(307) 332-4542

September 23, 1985

Forest Supervisor
Shoshone National Forest
P.O. Box 2140
Cody, Wyoming 82414

Dear Sir:

This letter is in regard to the planned timber harvest on the Lander District according to the new Forest Management Plan. As I am sure your are aware, the South Pass area has been devastated by the mountain pine beetle. A program to clean up the devastated stands alone would require an allowable cut two or three times the amount proposed in your plan.

We own and operate a small mill in Lander and have just completed a substantial expansion of our facilities. This expansion was funded by an S.B.A. loan package and a W.C.D.B.G. loan through the City of Lander. This financial package was put toghether to create jobs in the wake of the closure of U.S. Steel at Atlantic City. Our expansion was based on a letter from the district ranger at that time, Bob Hammond, stating that the Forest Service would try to sell approximately 1.0MMBFT. per year. The proposed plan seems to be far short of this volume.

The Loop Road on South Pass in now a potentially dangerous area due to the number of users and the large amounts of fuel wood in many of the stands in the area. These stands need to be cleared up in the interest of public safety.

Your 10 year and 50 year forest plan should reflect these needs and dangers in the Timber sale volumns proposed. The current plan calls for an average of approximately 260MBft on a green basis which is substantially less than the program set up by your forester and district ranger in the Lander office. Why were these programs totally ingnored in the plan's present form? In order to survive in our expanded form we need to be able to buy approximately 500MBft dead and 500MBft green from the Shoshone forest in this area. It is the closest supply of timber and therefore vital to our mill.

I feel your Timber sales program for the Lander area should be reviewed and changed to reflect our situation here and the recomended program of your own people in this office.

Sincerely,

Patrick C. Hickerson

VI-102

1

39-1 Based on public comment, and the need to manage timber stands on the Lander District, the Plan will be changed to reflect a harvest if one million board feet of timber. This will consist of 50% dead and 50% live. See also response to comment 80-2.

Comment 40

Forest Service Response

RECEIVED SEP 2 5 1985

CODY LUMBER, Inc.

Phone 527-7193

P.O. Box 757
Cody, Wyoming

FPD-40-R-4-B
Proj. No. Or...

September 24, 1985

Shoshone National Forest
Forest Supervisor's Office
P. O. Box 2140
Cody, Wyoming 82414

Re: 1920

Gentlemen:

After reading the draft Environmental Impact Statement and proposed Forest Plan, I feel I must go along with alternate D proposed by the Forest Service.

I would like to see commodities favored more, but I am afriad that our preservationist friends can not understand any of this. They are not happy with 60% of the forest; they want it all. The Forest Service has forgotten about the Wyoming Wilderness bill that was passed to free the remaining 40% of the forest for the multiple use concept.

The public needs to be better informed as to what is taking place on the forest through timber harvesting, exploration work, cattle grazing, and so on. They need to know and understand that through these programs money is obtained to help provide the campgrounds they want, the trails they hike on, and the roads they travel on.

I am sure with the staff now on the Shoshone and through efforts of industry to do a better job there can and will be room for our timber operations to continue. We would like to continue to provide the 40 plus jobs to the Cody community.

Thank you for the opportunity to comment on this issue.

Sincerely,

Mike Hanson
President

MH:lh

VI-103

Thank you for your comment.

RECEIVED SEP 2 6 1985

FDP- 41 - F - L - C
Proj. No. Orig Type Affil

S Benson
Box 741
Dubois Wy 82513

RECEIVED
SHOSHONE NATIONAL FOREST
SEP 25 11 07 AM '85
U.S. FOREST SERVICE
CODY, WYOMING

Comments on Proposed Shoshone Forest Plan
Submitted By Scott Benson Box 741 Dubois

- Why is there no C04 coded for Simpson & ~~Union~~ Whiskey Mtn.? | 1

41-1 See Plan, Chapter III under Management Prescription 8E and Plan, Appendix J under analysis area 189.

- I feel more than 10% of available forage should be reserved for wildlife in the Red Creek area. | 2

41-2 Range utilization surveys have been conducted in the Red Creek area. These surveys have indicated that wildlife are not fully utilizing the existing forage. Therefore, the Plan does not reflect more than a ten percent increase in the amount of forage left for wildlife.

- How do you plan to police for trespass livestock in Red Creek? | 3

41-3 Grazing use on all allotments is checked periodically through the season by Forest Service employees. In the event a particular area is experiencing a problem, additional checks will be made. In addition, livestock permittees, recreation users, and wilderness guards often report unauthorized uses.

- I feel some available forage outside of CPWR should be preserved for wildlife. | 4

41-4 Additional forage outside CPWR has been provided for. See individual prescriptions for analysis areas in Appendix J of the Forest Plan.

- The AUMs for grazing on Whiskey Mtn should be gradually phased out. | 5

41-5 Any conflict between domestic livestock grazing and bighorn sheep will be resolved in favor of sheep.

- The contol or partial control of disease problems thru fire has not been adequately considered. | 6

41-6 The Forest Plan utilizes the best currently available scientific information regarding silvicultural practices. This information contributed to the establishment of the silvicultural standards and practices listed in the Forest Plan. As additional knowledge is gained, practices can be improved.

With vast, continuous areas of heavy timber (those most susceptible to insect and disease attack), it is very difficult and expensive to attempt to control burn acres of 40 acres or less. In addition, lodgepole pine stands with nonserotinous cones, are slow to regenerate naturally following fire.

- Alot of money & manpower is now being wasted in an attempt to put out fires which in many cases whould improve the potential of the forest. | 7

41-7 The importance of fire in its natural role in the ecosystem has been recognized, and the fire suppression guidelines in Apprendix F have been further liberalized between the draft and final Forest Plan.

- why set a 1000 or 3000 acre limit on fires; use natural barriers and evaluate each burn seperatly | 7

- C.P.W.R. for wildlife is not as well defined as you try to make it. ~~Some~~ MORE forage outside of your small delineated C.P.W.R. should be reserved for wildlife | 8

- I feel the Shoshone forest has to many timber specialist's and not enough wildlife managers.

- All important migration routes & Birthing areas should be withdrawn for oil & gas leasing. | 10

- TIMBER HARVESTING & Road building is overemphasized forest wide. | 11

- There should be a provision to temporarily lower the air quality index to allow for prescribed fire. | 12

- Potential to improve wildlife habitat thru prescribed fire in conifereous timber has not been adequately addressed. | 13

- Kill Smokey the Bear!

41-8 See response to comment 41-4.

41-10 The General Mining Laws guide what can or cannot be withdrawn from mineral entry and under what conditions. We direct your attention specifically to Plan, Chapter III in the blue pages under Mining Law Compliance and Administration (General Direction 1C and 2) and Minerals Management Oil and Gas and Geothermal (General Direction 1). All direction found under Minerals Management, supplemented by Plan Appendix K, is intended to protect existing and proposed uses of the land for other resources thereby avoiding the need for withdrawal. If exceptional situations arise, or existing direction is shown to be insufficient, the option of withdrawal remains.

Mineral operations are by law, a viable use of public land. Our charter, provided by Congressional action, is to manage first according to law, and not strictly according to variable market pressures. The mining laws stipulate that lease applications can be made and must be considered for lands not withdrawn. The Forest Plan was selected in large part because it allows mineral activities while recognizing and maintaining the values of clean water, stable wildlife populations, and recreation opportunities which are of primary importance to many Forest users. The Forest Plan affords adequate protection of popular recreation areas, critical wildlife habitat, and other such resource values through application of stipulations and recommended operating procedures. Protection may be in the form of seasonal restrictions or no-surface-occupancy stipulations (see Appendix K of the Plan).

One consideration here is that a lease may never result in actual drilling activity; historically, a low percentage of leases are explored or developed, due in part to market fluctuations and uncertainties.

41-11 In response to numerous concerns, the number of acres managed for timber harvest and the resultant amount of roads has been reduced in the final Plan. In the next fifty years, the Plan projects only eighty miles of new road which will be open to the public. There is projected 120 miles of existing road which will be improved and remain open to the public. An additional 150 miles of new road, and 255 miles of reconstructed existing roads are projected to be closed to the public within the 50 year period. Road construction and reconstruction figures have been corrected. See also response to comments 182-5, 33-9, 80-5, and 44-46.

41-12 Prescribed burning is a tool to be used routinely in vegetation or fuels management. Its use is not unduly restrained by the regulatory authority for air quality in the State of Wyoming (Wyoming Department of Enviornmental Quality). Such burning is planned by developing a prescription that expresses atmospheric and fuel conditions favorable for doing the job with minimal impacts. The Forest Service notifies the State when all such projects are scheduled. The State has not, to date, rejected a prescribed burn on the basis of its air quality implementation plan.

41-13 It is very expensive to use prescribed fire in coniferous forest due to difficulty in containing the prescribed fire.

Comment 42

JOHN R. SWANSON
P. O. Box 912
Berkeley, CA 94701

RECEIVED SEP 2 6 1985

FPD - 42 - 0 - L - C
Proj. No. Orig Type Assn

[illegible]
Shoshone National Forest
[illegible]
Cody, Wyoming [illegible]

[illegible]

Please accept my comments as follows, concerning — [illegible] Resource Management Plan - Shoshone National Forest. [illegible]

[illegible]

- Absaroka - Beartooth Wilderness additions, only. 7218.
- North Absaroka Wilderness additions, only 167,432.
- Washakie Wilderness additions, only 301,217.
- Fitzpatrick Wilderness additions, only 16,181
- Popo Agie Wilderness additions, only 62,489.
- High Lakes 24,917.
- Dunoir 49,069
- South Beartooth 116,312
- Sheridan Pass 11,247
- Little Popo Agie 8,853.
- Canyon Creek 8,113
- Pass Creek 6,989.

- Plus an additional 34,000 acres.
- To select a total of some 2,196,000 acres of Wilderness to be located on this Shoshone National Forest [illegible] to be included in our National Wilderness Preservation System — at this time —

[illegible]

42-1

Forest Service Response

The major purposes and responsibilities of the Forest Service are stated primarily in two Federal Laws, the Multiple Use Sustained Yield Act of 1960 and the National Forest Management Act of 1976. These laws clearly direct the Forest Service to provide, as appropriate, on National Forest System lands for all the multiple uses. Accordingly, the goal of Forest Service planning is to produce plans which provide for multiple use and sustained yield of products and services and, in particular, include coordination of outdoor recreation, range, timber, watershed, wildlife and fish and wilderness (16 U.S.C. 1600) in a way that maximizes long-term net public benefits in an environmentally sound manner (36 CFR 219.1). In short, the primary planning goal requires production of goods and services which assures coordination of resources and maximizes net public benefits.

Wilderness is but one of several multiple use values to be provided on the Shoshone. The suitability of the Forest for wilderness has been evaluated with the result that approximately 57% of the Forest's roughly 2.5 million acres have been designated as wilderness. The most recent wilderness additions occurred in 1984 as a result of the Wyoming Wilderness Act. This act also directed the release of nonselected areas for multiple use management. Forest Plan direction for these released areas as well as other multiple use management areas is to emphasize production of non-commodities while maintaining historic levels of production of commodities. This philosophy was chosen in recognition of the value of the Shoshone to the American public in terms of wildlife; high quality, low density recreation; and outstanding scenic values as well as its role in the Greater Yellowstone area. Production of commodities on the Forest as proposed in the Plan, is done under standards which are designed to enhance non-commodities as much as possible. For example, standards for timber harvests including cut block size, dispersion of cuts, density of roads and timber road management are designed to use commerical timber operations to improve cover to forage ratios for wildlife as well as improve the distribution and amount of structural and vegetative diversity in a way that allows for enhanced recreation access to the Forest when appropriate as well as visual diversity. Because all harvests in the Plan are above cost sales, they provide a mechanism for improving vegetative communities on the Forest, improving wildlife habitat and improving recreational opportunities in a very cost efficient manner. See also response to comment 44-46.

The Clarks Fork River has been recommended for Wild and Scenic River status. The Forest Plan is to maintain the Clarks Fork River in its current condition until Congressional consideration is given to the President's recommendation.

State of Wyoming Game and Fish Department big game herd population objectives will be met fully in all areas but one. The gizzly bear will be given primary management consideration in areas where it occurs on the Forest, approximately 52% of the total Forest acreage.

Comment 43

Forest Service Response

RECEIVED SEP 26 1985

conoco

Mark K. Mosley
Division Manager
Production Department

Conoco Inc.
907 North Poplar
Casper, WY 82601
(307) 234-7311

September 24, 1985

EPD - 43 - W - L - B
Proj. No. Orig Type Affil

Mr. Stephen P. Mealey
Forest Supervisor
Shoshone National Forest
P. O. Box 2140
Cody, WY 82144

Dear Mr. Mealey:

SHOSHONE NATIONAL FOREST
DRAFT LAND RESOURCE MANAGEMENT PLAN (RMP) COMMENTS
FILE: DM-933-CF

The Casper Division of the Conoco Inc., North American Production Department, appreciates the opportunity to comment on the subject draft Resource Management Plan (RMP). As an active oil and gas exploration and production company in Wyoming, we are concerned with the long term planning goals and objectives for all public lands in the state.

We support public land management decisions which reflect the "multiple-use" concept of natural resource utilization. The subject RMP proposes planning alternatives which severely restrict oil and gas activity in the Forest. When wilderness areas, No Surface Occupancy stipulations, Wild and Scenic River areas, grizzly bear habitat areas, and other special areas are withdrawn from leasing availability, only 16% of the more than 2.4 million acres are left for normal oil and gas leasing. Furthermore, the document refers to helicopter mobilization as an apparent panacea for drilling "isolated tracts" which we perceive to be areas away from existing roads and corridors. Such a stipulation would further reduce acreage available for leasing due to the extreme costs involved in such mobilization. We further add that costs of helicopter mobilization is not the only factor involved. Availability of helicopter-portable rigs and the fact that such technology is not possible in certain high altitude locations must also be considered. 1

There are numerous data to demonstrate that properly planned oil and gas exploration and production operations can exist with little, if any, impact on forest ecosystems. Reclamation techniques have progressed to the point that even habitat improvement can be obtained in certain instances. At the least, the land can be restored to its original condition. With respect to valued big game species such as moose, elk, and deer, we suggest that temporary displacement of these animals from a localized area due to exploration activities does not justify total exclusion of such operations.

43-1 See response to comment 68-5.

Comment 43

FPD-43-W-L-6
Proj. No. Orig Type Appl

Mr. Stephen P. Mealey
Forest Supervisor
Shoshone National Forest
September 24, 1985
Page Two

We contend that the U.S. Forest Service has not adopted a balanced definition of what constitutes the "public interest" in developing long-term goals for the Shoshone National Forest. We urge your department to look at what can be accomplished regarding the oil and gas industry's ability to coexist with other resource development objectives, and not to succumb to pressure from local factions whose biases do not reflect the "public interest" from a national standpoint. 2

Again, thank you for the opportunity to comment on this issue.

Sincerely,

Mark K. Mosley
Division Manager

REA/pah

Forest Service Response

43-2

The various alternatives were developed through a scoping process that included consultation with a variety of groups, including those affiliated with the oil and gas industry. (See pages VI-1 to VI-6 of the chapter). The alternatives were evaluated through a social impact assessment that again included a variety of concerns, including oil and gas. Alternative D, which restrains oil and gas activities to a degree, was most acceptable in terms of resolving social conflicts (See Appendix F of the EIS). It was also among the most acceptable in terms of environmental effects (See Chapter IV of the EIS). In addition, our internal analysis of oil and gas as a valued resource was accomplished using a procedure that had the full support of our correspondents in the oil and gas industry (see Appendix D, EIS, Oil and Gas Valuation). Use of this procedure and how it was going to be displayed as well as a preview of the draft documents were done with regional representatives of this group. Input from this group was relied on as much as any other local, regional or national group.

The NEPA process does not try to determine which comments were more important than others, or determine which issues were emotional and which were fact. It simply takes the issues and develops a series of alternatives to include the issues raised in the EIS process. It is not a voting process. There is considerable polarization because of the many uses and many users of the Forest. Appendix F of the EIS has dealt with the social impact analysis with the framework of the alternatives generated by the scoping process.

Comment 44

RECEIVED SEP 2 6 1985

FPD - 44 - W - L - E
Proj. No. Orig Type Affil

Wyoming Wildlife Federation
P.O. Box 106, Cheyenne, WY 82003
307-637-5433

September 19, 1985

Mr. Tory Taylor
Spring Ranch RR 31
Dubois, Wyoming 82513

and

Chris H. Peterson
3519 Partridge Lane
Casper, WY 82604

Mr. Stephen P. Mealey, Forest Supervisor
Shoshone National Forest
Post Office Box 2140
Cody, Wyoming 82414

Dear Mr. Mealey:

The Wyoming Wildlife Federation is Wyoming's oldest and largest organization of sportsmen and outdoor clubs. Our membership, presently over 8,000 strong, is composed of men and women from business, manufacturing, construction, educational, professional, energy, and agricultural backgrounds. We are a broadly-based, mainstream group of Wyoming citizens endorsing both consumptive use of and conservation of our natural resources. Our uniting concern is for the preservation of the special Wyoming way of life which is based upon hunting, fishing, and other outdoor recreational activities. This way of life is closely dependent on the continuing conservation of Wyoming's superb wildlife and wildlife habitat.

Please accept these comments on the Shoshone National Forest Draft Environmental Impact Statement and Proposed Land and Resource Management Plan as constructive suggestions and criticisms designed to promote multiple use management of the public lands under your charge. The Wyoming Wildlife Federation believes that the Shoshone National Forest's most valuable resources are its wildlife and its wildlife-related recreational opportunities. Our comments, compiled by Shoshone Forest Planning Committee Chairman, Tory Taylor, are based on this belief. Some of our criticisms of the draft plan are based on information from a

WORKING TODAY FOR WILDLIFE'S TOMORROW!
Wyoming Affiliate of the National Wildlife Federation

Comment 44

FPD-44-W-L-E
Proj. No. Orig Type Aff.

Stephen P. Mealey
September 19, 1985
Page 2

review of the plan done by Randall O'Toole and Deiter Mahlien of the Cascade Holistic Economic Consultants. This CHEC review is included as part of our comments.

Sincerely,

Chris H. Peterson

Chris H. Peterson
Vice-President, WWF

Enclosure

cc: Senator Alan Simpson
Senator Malcolm Wallop
Representative Richard R. Cheney
Representative John Seiberling
Wyoming Game and Fish Department

Comment 44

FPD - 44 - W - L - E
Proj. No. Orig Type Appl

Wyoming Wildlife Federation
Shoshone National Forest Comments
Page 1

ALTERNATIVES

In the review of the draft plan, it is felt that a broad range of alternatives is lacking and there is little difference in outputs in many of the alternatives. (CHEC p. 12-13) Our main criticism of the alternatives is that they are designed to maintain only the numbers of big game animals at present Wyoming Game and Fish herd objectives. At the end of the 50 year planning horizon, we will find a greatly increased number of hunters competing for the same number of game animals that we have today. Therefore, we would like to see an alternative that would explore the possibility of a substantial increase in game animal numbers. It is our understanding the Wyoming Game and Fish Department's herd objectives could be increased in many units by planning, management, and a cooperative effort between government agencies and private interests. 1 2

Alternative A

The WWF feels a change from current direction is needed and views Alternative A as undesirable.

Alternative B

Alternative B places its emphasis on the extraction of resources, making this alternative unacceptable to the Federation.

Alternative C

Page II-27, DEIS, states, "The purpose of forest planning is to identify and select for implementation that alternative that maximizes net public benefits. Net public benefits are defined as the overall long-term value to the nation of all outputs and positive effects, whether they can be quantitiatively valued or not, consistent with the principles of multiple-use and sustained yield management". With this definition in mind,

Forest Service Response

44-1 These comments are based on a study of the set of FORPLAN models used in formulation and analysis of all alternatives. The contention is that all prescriptions which included the development of roads within an analysis area required harvest of timber. This is absolutely not true. A full range of prescriptions was written for each analysis area. For those areas containing tentatively suitable timberland, prescriptions included development of a road network necessary to support intensive management of recreation, wildlife, and range and would support the harvest of timber. Such prescriptions did not require that timber be harvested, they merely allowed such timber to be accessed. The model was given the choice of harvesting or not harvesting such timber based on the economics of the timber sale. Due to timber economics alone, over 59,000 acres of tentatively suitable timber were not selected for harvest. The remaining 85,000 acres were found to support economically viable timber sales which could be integrated into the multiple-use management strategy for adjoining lands. This and other reasons for the apparent narrow range of alternatives such as little choice in management for the 57% of the Forest which is inside classified wilderness areas are discussed at length in Appendix B in the EIS.

If left to economics and analysis alone, timber harvest for all but alternative E would be almost identical at around 11.0 MMBF per year. In order to provide a wider range of timber harvest, timber harvest was constrained to not exceed 8 MMBF in alternative C and to be at least 13 MMBF in alternative B.

As mentioned by the individual reviewing FORPLAN models used, there were no direct ties between increased recreation (including hunting) and timber harvest included in these models. Similarly, there were no direct causal links between increased timber harvest and wildlife habitat. The estimates for recreation, hunting, and wildlife habitat were made assuming that timber was to be harvested as shown in a FORPLAN run with maximum present net value and nondeclining flow as objetive functions. The decision to harvest or not harvest timber was based soley on the economics of timber management. There was no requirement built into the model which would have prohibited the model from building roads in an area and managing that area intensively for a mix of roaded and nonroaded recreation and wildlife and still not harvest timber. The timber harvest question was handled in a separate portion of the model. In other words, the model was free to choose just the type of management strategy called for in this comment for all alternatives.

Why, then, did the model choose to harvest timber when it was not required to do so? The answer is simply that from an economic standpoint, given the costs of timber management, local demand for that timber, and historic and prevailing stumpage prices, such harvest was economically viable. The revenues generated through timber harvest covered all timber costs (and quite possibly a portion of these revenues could be used to help defray costs of managing the area for recreation and wildlife, including developing the transportation network necessary for supporting these other uses).

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it is hard for us to understand why Alternative C was not the preferred alternative since it emphasizes wildlife and recreation while insuring minimum acceptable levels of commodity outputs. The greatest contribution the Shoshone National Forest can make to the nation is its wildlife and recreation. Oil, lumber, and livestock can be produced in many parts of our country, but to hunt elk or watch bighorns clash heads are situations unique to few places on earth. 3

Alternative D

Alternative D looks good on paper but we are skeptical that it can be implemented successfully. The statement on p. II-24, DEIS, "This (alternative D) is achieved by maintaining commodity outputs while at the same time improving distribution of recreation opportunity, and increasing wildlife habitat, recreation capacity, visual quality, and water quality", is not realistic. In the past, wildlife has suffered in the Shoshone National Forest when commodity production was over emphasized. If Alternative D is to work successfully for wildlife it will require, 1) implementing a closer working relationship with the Wyoming Game and Fish Department, 2) a monitoring system that spells out what will happen if wildlife numbers decline or hunting and fishing opportunities drop to an unacceptable level (see CHEC p. 17-18), and 3) when conflicts between commodity production and non-commodities arise, which surely they will, they must be resolved in favor of wildlife. 4

A weakness of Alternative D is that it is contradictory to the conclusions of the social impact assessment. Appendix F, DEIS, p. F-12 states, " From three of the four scoring alternatives, it appears that the alternative which limited production of commodities to circumstances which would benefit non-commodities such as wildlife and visuals, reduced polarization even though it was an "extreme" alternative. This was in contrast to the 5

Forest Service Response

Results from the models from each alternative were examined to see if they were realistic and if they fit the intent of the alternative. Initial results often were not. This necessitated many iterations of analysis to formulate the final set of alternatives. These iterations are documented in Appendix B in the EIS. Such re-examination means that the model was not in total control of results and final harvest levels; and that resource specialists including District Rangers and the Forest Supervisor provided input to formulate a realistic and reasonable set of alternatives.

During examination of model results, resource specialists had the opportunity to note and estimate effects not directly modeled. If these effects were significant enough that they would alter the final choice of management strategies for any area of the Forest, they were added to the model and the model was re-run. If they were not of a significance that would change the choice of a management strategy, they were noted and included in the tabulation of effects of each alternative. All of these, including localized benefits of the timber program such as improving wildlife habitat, were included in discussions of the environmental consequences of each alternative. Because the amount of timbered land on the Forest being managed for timber production is less than .4 percent per decade, benefits for wildlife and control of insects and disease are almost insignificant when viewed from a forestwide perspective. However, in examination of each analysis area and the management strategy selected for it, there were instances where such benefits were of local significance. These are reported in Chapter IV of the EIS.

The range of alternatives was specifically discussed in Chapter II of the DEIS on pages II-49 and II-50 in the section entitled COMPARISON OF ESTIMATED OUTPUTS. This discussion is retained in the FEIS.

44-2 Big game population objectives are not constant and are updated periodically with cooperation between Wyoming Game and Fish and Forest Service.

44-3 Based on all analysis, the Forest Service believes that Alternative D presents a more balanced mix of Forest uses than Alternative C. Alternative D as a whole responds better to the issues and concerns identified.

44-4 On some areas of the Forest when a conflict arises between wildlife and commodity production, wildlife will be favored. On other areas, the commodity production will be favored. The overall objective is to maintain habitat sufficient to support Wyoming Game and Fish herd unit objectives.

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increase in polarization associated with the alternative emphasizing production of commodities and the alternative that attempted a compromise". Is not Alternative D an attempt at a compromise and Alternative C an alternative which limits production of commodities to circumstances which benefit non-commodities such as wildlife and visuals? Won't Alternative D continue to polarize people? 5

Alternative E

Alternative E shows forage available for wildlife at over two and a half times greater than the current level and far above all other alternatives, p. II-49, DEIS. Soil erosion under this alternative is lower than all other alternatives, p. II-68, DEIS, which would be a benefit for fish habitat. We understand the reasons for these figures is that a reduced budget results in less money for multiple use programs. Does this mean the most benefits for wildlife would result from little or no multiple-use management on the Shoshone National Forest? 6

VALUES

Many economic and net public benefit values appear to be in error. Note the discussion of timber, grazing, recreation, and water in CHEC, p. 7-11.

According to the Game and Fish 1984 annual report, $1,949.80 was returned to the state's economy for each of the 13,562 elk harvested, and $3,027.78 was returned to the state's economy for each of the 186 bighorn sheep harvested. Dollar figures for non-consumptive use of wildlife are not easily defined. Yet it is clear that emphasis of wildlife and recreation on the Shoshone takes good economic sense. We have concerns about the present net values assigned to these resources. For example, the Resource Planning Act, 1985 Assessment places the value of a big game hunting wildlife user day at $41.00, table II-I, p. II-6, DEIS. 7

Forest Service Response

44-5 As the commenter points out, an alternative which emphasized amenity values resulted in less polarization in three of four measures of polarization. The measure in which it did not was a measure of intensity of polarization. Using this measure, a compromise between amenities and commodities scored the best. All alternatives will produce some polarization. However, alternative D should produce the least intense reaction. This means that groups on either side of an issue will still oppose each other, but the intensity of that opposition should be low enough for the groups to talk to one another and work with the Forest Service to develop an method for management which is acceptable to each.

44-6 Alternative E reduces domestic livestock grazing and allocates more forage to wildlife. See response to comment 19-2.

44-7 The RPA values used for recreation and hunting are based on a large number of studies done across the country. These values are referred to as "willingness-to-pay" values. Such values are what recreationalists or hunters would be willing to pay for their recreation opportunity. Calculation of these values for hunting, for example, is based on but not equal to the amount a hunter spends. For example, studies on hunter expenditures include expenditures for food. In calculation of willingness-to-pay values, it is often assumed that the hunter would purchase and consume food even if he/she were not hunting. Thus this portion would not be included in willingness-to-pay values. This accounts, in part for the differences between the values included in analysis and those calculated by the Wyoming Game and Fish. A second, more technical reason, is that the base year for the dollars in the Wyoming Game and Fish studies was 1984 while the base year for dollars in the Plan is 1982. Thus there is a need to adjust these figures based on inflation so that they are in the same base.

Money returned to the economy including that portion of what hunters reported spending per day within local economies are also included in analysis. These monies are not included in economic efficiency analysis for they do not represent the willingness to pay value. However, they are included in economic impact analysis of all alternatives. In this way, both the total expenditures and impacts of these are included in analysis.

The values used in the Plan were based on values used for 1985 RPA update. In combining the various types of hunting as reported in RVD's required averaging. A 24 hour hunting day would be reported as two hunter RVD's by the Forest Service, therefore, the values shown on B-33 would be doubled and therefore more in line with the State's values.

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The Wyoming Game and Fish 1984 annual report lists the amount spent per day by mule deer hunters at $68.18, elk hunters at $83.37, moose hunters at $104.30, bighorn sheep hunters at $143.85, and mountain goat hunters at $143.85. The $41.00 per big game hunting WUD assigned by RPA appears to be low. 7

Another example of questionable values appears in chapter III, DEIS. It is usually agreed non-consumptive use of wildlife exceeds consumptive use. On page III-35 we find in 1981 bighorn sheep provided 2,700 consumptive recreation visitor days forestwide and 60,000 non-consumptive recreation visitor days on Whiskey Mountain alone, which supports this conclusion. However, table III-14, p. 37, DEIS, assigns the same figure to consumptive and non-consumptive wildlife user days. 8

Another example shows the projected average annual activities of non-consumptive wildlife use in terms of MWUD's to remain at 96.3 throughout all planning periods, p. III-12, table III-1, draft plan (DP). Certainly this is incorrect since non-consumptive wildlife use will increase during the next 50 years.

Because of questionable assumptions and values, it seems FORPLAN automatically equates increased timbering with increased recreation and wildlife. The WWF feels that an incorrect low value given to wildlife and recreation will negatively affect FORPLAN and future management decisions on the Shoshone. 9

Page II-60, table II-7, DEIS, shows the average annual acres of wildlife habitat improvement objectives. In planning period 1 the regional objectives assigned to the forest are roughly 30 times greater than any alternative. Can this be the case or is this figure incorrect? 10

TRANSPORTATION FACILITIES

The WWF believes the management of the Shoshone's road and trail system has the greatest potential to impact wildlife, either negatively or positively, than any other factor. Roading and trail

44-8 We agree that nonconsumptive wildlife use probably exceeds consumptive use; however, there is no existing data to indicate what the difference is forestwide. We therefore took a conservative approach and used a 1:1 ratio.

44-9 See response to comment 44-1, 44-7 and 182-5.

44-10 The RPA habitat improvement targets were expressed in acre equivalents. Forest Plan acres are expressed in direct acres affected. Acreage equivalants varies from one treated to one acre improvement, to one acre treated to 640 acre improvement; therefore, the disparity between the figures. The Plan provides for a significant amount of habitat improvement over current management. See also response to comment 105-1.

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building are tools that can be used to manage people in wildlife habitat and migration corridors.

Roads

The general consensus of the public is that there is already an excess of roads in the National Forest system and, despite its 1,379,048 acres of wilderness, the Shoshone is no exception. Programs of road closures, road obliterations, high quality visual standards, and valid justification of new road construction must be adhered to in order to achieve wildlife and recreation goals.

Statements such as, "The Big Horn Basin 208 plan generally concluded that primary potential for water pollution lies with road construction, but that logging, grazing, and recreation all may have an impact", (DEIS, p. III-55), and, "Road maintenance funds have not been sufficient in recent years", (DEIS, p. III-68), make us uncomfortable with the fact that 23.8 miles of roads will be constructed or reconstructed per year during planning period 1 under the Forest Service's perferred alternative. (DEIS, p. II-54, table II-5) This is a higher figure of annual road construction/reconstruction than under any of the other alternatives. The WWF is alarmed at these figures because of potential conflicts between roads and wildlife. 11

The current road density in available roaded recreation land in the Shoshone National Forest is 2.1 miles per square mile. According to CHEC, p. 6, research indicates that elk habitat is reduced by 50 percent when there are 2 miles of roads per square mile of land. Therefore, the WWF protests any further road construction. 12

The WWF requests the Shoshone National Forest use the following maximum road density standard:

1.2 average miles per square mile
2 maximum miles per square mile

Failure to use this standard can reduce the acres of elk habitat

44-11

In response to numerous concerns, the number of acres managed for timber harvest and the resultant amount of roads has been reduced in the final Plan. In the next fifty years, the Plan projects only eighty miles of new road which will be open to the public. There is projected 120 miles of existing road which will be improved and remain open to the public. An additional 150 miles of new road, and 255 miles of reconstructed existing roads are projected to be closed to the public within the 50 year period. Road construction and reconstruction figures have been corrected. See also response to comments 182-5, 33-9, 80-5, and 44-46.

The Forest Plan will guide management over the next 10 to 15 years and will be revised every 15 years or sooner in response to major changes in information or needs of the American public. Projections over 50 years are provided to portray long term consequences only.

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in forested areas.

A discussion on p. IV-71, DEIS, states, "Public use of roads and trails and off-road vehicle use in winter big game habitat during winter can severely reduce the effective use of this habitat. Snowmobiling can harass wildlife. In all alternatives, these effects (game harassment on winter range) would be mitigated by favoring wildlife in resolving conflicts with public use." Also the standards and guidelines of the management prescription summary of prescriptions 5A and 5B, p. III-168, 177, 178, DP, clearly outline management procedures with full involvement of the Wyoming Game and Fish Department. Yet, the wintering Dick Creek elk herd, Greybull District, are routinely displaced off forest lands and onto private land by snowmobiling. Inconsistencies between Forest Service plans and actual Forest Service practice of its transportation system's standards and guidelines will not be taken lightly by the Wyoming Wildlife Federation. 12

44-12 To access all timber in a continuously timbered area requires approximately 4 miles of road per square mile. The majority of these roads are local and are scheduled to be closed following timber harvest. Road management decisions and the decisions to build new roads are based on a consideration of all resources in an area, including wildlife needs and the targeted recreation opportunities being provided. The Forest Service is well aware of problems in road closure enforcement. See also response to comments 146-14. The standards for road densities contained in the forest standards and guidelines and in the individual management area prescriptions have remained unchanged.

To state that roads harm wildlife is an oversimplification. Certainly they can be very harmful to wildlife. Proposals to build roads into roadless areas are done in an interdisciplinary fashion to consider all resource management needs. The Forest Service mission is not only to protecprotect wildlife but also to provide a mix of recreation opportunities and produce timber and quality water etc. Only 80 miles of the 230 miles of new roads in the Plan will be open for public use. Because use of roads by the public is the greatest threat to wildlife, seasonal restrictions designed to protect wildlife are imposed even on those 80 miles which pass through wildlife sensitive areas. Scheduling of road construction, location of roads, and management of completed roads can be controlled such that wildlife is not harmed.

Trails

Discussion on p. III-69, DEIS, states, "Of the 1,294 miles of existing trails on the system, 31 percent are classified as being inadequate and needing either reconstruction or relocation and new construction. About 70 percent of these trails are located within the forest's wilderness. Currently 30 miles of trails are being maintained by user or trail organizations and the remainder (about 1,264 miles) by the forest service. For the past several years, funding has been at a level that allows for only minimal maintenance. All miles are maintained, but only about a third of the needed work is done. Funds are used primarily to keep the trail system open with few efforts directed toward preventive maintenance, due to budget constraints." Because the WWF believes non-motorized recreation is one of the highest valued resources on the Shoshone, the above facts concern us very much. We hope recreation will receive adequate management 13

44-13 The Forest Service recognizes the need for additional financing for trail construction and maintenance, and wilderness dispersed camping site reclamation. Implementation of the Plan would provide for this additional emphasis.

Currently, Congress disperses money to the forests by appropriation. This mean there are separate monies for trails, roads, dispersed recreation. By law, the Forest Service cannot use money appropriated for one function, to do work in another. Thus, road money cannot be diverted to trail work.

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and funds in the future.

We disagree with the prescription of analysis area (AA), 56 - Venus Creek, p. J-105, DP, which calls for no maintenance of the Bonney Creek trail. Abandonment of this trail will negatively affect recreation and outfitting opportunities. 14

44-14 The Bonney Creek trail will not be maintained because the topography of the area is such that a trail cannot be properly located and maintained. A safe, well drained trail with acceptable grades would require extensive cut and fill slopes, switchbacks and cribbing. It would be a major disturbance to the area in terms of visual and soil resources. The present trail, which was developed in the early years by stockmen, is unsafe, expensive to maintain, and the light use that it receives does not justify monetary outlays for maintenance.

RANGE

For the most part the Wyoming Wildlife Federation has no problem with the proposed grazing direction on the Shoshone. However, there are a few areas where grazing conflicts with wildlife and recreation and damages riparian areas. These problems must be dealt with on a case by case basis regardless of the alternative implemented.

Under all alternatives, the grazing capacity will increase, yet how this increase will be used is not clear. Forest Service personnel have indicated this increased forage is more or less up for grabs. The WWF respectfully submits these suggestions, 1) increased forage should be allotted to wildlife, particularly in wildlife winter ranges, 2) increased forage should be allotted to recreational livestock use, 3) increased forage offers the opportunity to transfer livestock from those existing cattle and sheep allotments which have problems with recreation, wildlife, and/or riparian areas to areas where those problems will be reduced, and 4) increased forage should not result in increased cattle or sheep allotments. We feel an increase in cattle or sheep allotments is not desirable. How the increased grazing capacity will be used needs to be spelled out in the final forest plan. 15

44-15 The forage would be allocated to both unless there is a change in Wyoming Game and Fish population objectives or Range Allotment Management Plans.

We do not understand why there is a need to increase livestock grazing capacity by 37,700 AUM's during the next 50 years, p. IV-35, table IV-11, DEIS, when some existing cattle and sheep allotments are currently not being fully used.

The proposed plan discusses the possibility of converting sheep allotments to cattle. The WWF does not favor this idea. 16

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Many sheep allotments are in the higher elevations which big game animals favor for summer range. Some of the allotments are in sensitive alpine regions. A number of them contain existing or potential recreational areas. It would serve the public better to convert the abandoned sheep allotments to wildlife and recreational livestock allotments. An example of this is the area containing the headwaters of the East Fork of the Wind River, AA 194 - East Fork and AA 195 - Nine Mile.

Our fears are based upon situations where sheep to cattle allotments have been attempted and resulted in negative impacts on wildlife. An example of this is in the Greybull District, AA 58 - Eleanor and AA 68 - Warhouse. These areas contain crucial preferred winter range for 280 bighorn sheep and 100 elk and preferred spring range for 1,500 elk. The allotment conversion was attempted with mitigations included to protect the wildlife habitat but the cattle have not been successfully kept off the crucial preferred winter range as planned.

16

44-16 Neither analysis area 194 nor analysis area 195 will be managed for domestic livestock. Should a conversion from sheep to cattle be proposed, only after an analysis concludes the range is suitable will a conversion be made.

There seems to be a problem with the economic value assigned to grazing. (see CHEC, p. 9) According to table II-2, p. II-8, DP, in 1982 the Shoshone National Forest lost $160,655 on its grazing program. This makes us wonder if the present net value of $9.09 per AUM reflects the benefits of the owners of the forest, the public, or reflects the benefits of the 89 permit holders.

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44-17 The value of $9.09/AUM of cattle forage was derived by the Economic Research Service based on ranch budget studies done on the Forest. This value represents the value of forage based upon the economics of operating ranches in this area and cost of grazing on private lands. This value assumes that all maintenance of structures, water developments and salting are done for the permittee as they would be if the permittee were renting a privately owned pasture. The Forest Service requires the permittee to pay for maintenance of structures as well as salting, thus the $9.09 overstates what a permittee should be charged. Grazing fees are set by Congress and reflect the difference between the value of forage and costs incurred by permittees. Including the $9.09 value for AUMs of which only a portion is recovered by the Forest Service is little different than including a value of $41.00 per hunter day to represent values for recreation even though the Forest Service does not charge the public for hunting. Both the $9.09 and $41.00 represent the value of these goods and services to the American Public.

The WWF recognizes that the agriculture community plays an important role in the future well-being of wildlife and that most ranchers are sensitive to the needs of wildlife. It is our desire to see the Shoshone managed in a way which will not pit ranchers against wildlife.

TIMBER

The propcsed plan and DEIS present basic Forest Service doctrine which equates good timber management with good management

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of other forest resources. The alleged benefits of timbering are emphasized while benefits of wildlife, recreation, wild and scenic rivers, wilderness, clean air and water are barely mentioned. Disease control is claimed to be a primary reason for timbering but the Forest Service has failed to prove that timbering is an effective measure against commandra blister rust. Wildlife habitat improvement, especially big game habitat, is always cited as a benefit of timbering but most timbering is done on summer range instead of winter range which is the controlling factor of big game populations on the Shoshone National Forest. Better motorized recreation is given as a timbering benefit but most roads are closed following timbering in order to protect other resources. The Forest Service assumes "most people enjoy a pattern of vegetation that includes many different ages and sizes of trees", p. III-45, DEIS. This assumption is highly debatable since many people prefer to look at an overmature tree than at a stump. Improved access for public firewood gathering is offered as a benefit but this was rebutted by a district ranger. Increased water yield is supposedly a benefit, but a maximum increase of .2 percent during the time period is is not needed does not support this alleged benefit. The justification and goal of a rather extensive Shoshone timber program is vegetation diversity. Then, we find on page IV-45, DEIS, "The timber sale program would be expected to have an insignificant effect on total vegetation diversity".

The WWF believes timbering is a viable multiple-use of the Shoshone National Forest but we cannot allow it and its related road building to jeopardize other resources.

During the comment period the acres available for timbering have been repeatedly changed and are still not clearly defined. We will not venture to comment on them until the Forest Service makes up its mind.

The standards for hiding cover need redefining. This is a

18

44-18 The Forest Plan utilizes the best currently available scientific information regarding silvicultural practices. This information contributed to the establishment of the silvicultural standards and practices listed in the Forest Plan. As additional knowledge is gained, practices can be improved.

With vast, continuous areas of heavy timber (those most susceptible to insect and disease attack), it is very difficult and expensive to attempt to control burn acres of 40 acres or less. In addition, lodgepole pine stands with nonserotinous cones, are slow to regenerate naturally following fire.

The planning process used did not assume that increased roading automatically benefited recreation. The relation of roads (existing and new) to recreation varies depending on the recreation opptunities being provided. Briefly, there are no roads allowed in Primitive areas, no open roads allowed in Semiprimitive Nonmotorized areas, only a certain density of roads allowed in Semiprimitive Motorized, and few restrictions on roads in Roaded Natural and Rural areas. Refer to EIS Chapter VII-Glossary under Recreation Opportunity Spectrum for for definitions. Prescriptions for individual areas were developed based on providing a targeted mix of recreation opportunities in that area. In or near that portion of an area targeted for primitive recreation, roads do not benefit, and in fact are a detriment, to recreation. In that portion of an area targeted for semiprimitive nonmotorized recreation roads will not benefit and may or may not be a detriment to recreation depending on location and road management. In areas targeted for motorized recreation, additional roads can benefit recreation. See response to comments 44-46 and 44-43.

The sustained yeild level established in the Forest Plan is based on projections of timber growth under prescribed management. These projections included estimates of mortality from insects and disease based on part insect and disease experience on the Forest.

Windthrow is generally not a problem on the Shoshone National Forest.

As population, nationally, increases and as international markets open for timber from the United States, demand for wood is projected to increase over the next 50 years. These national demand trends were disaggregated to the Forest level and modified based on the type timber and timber industry the Forest can support. The combination is a relatively small and slow growing demand for timber over the next 50 years. See also response to comments 44-44, 33-9.

Timber sales selected through the forest planning process have been selected to maximize present net value. Data is based on historic selling value and experienced costs. It is anticipated that future sales will not be "below cost" sales according to present knowledge of selling values and costs. Wildlife and recreation values have not been included in the calculations of PNV for the purposes of selecting sales for harvest.

See response to comment 44-43, 44-44, 44-46

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major weakness of the timber program. A timbered area is considered an opening until there are 150 lodgepole pines 6 feet tall per acre, p. III-183, DP. Even the Wyoming Game and Fish Department's recommendation of 450 trees 8 feet tall per acre seems unrealistic when considering the fact that an alarmed herd of elk often seeks the thickest, darkest timber available. On-site inspections by WWF members and Wyoming Game and Fish personnel of cutover areas qualifying as hiding cover have not been convincing. 19

Under the general direction guidelines, p. III-48, DP, the amount of hiding cover allowed to be removed on non-forested ecosystems seems high. Also, we were unable to find an explanation of what constitutes thermal cover for wintering big game in the documents.

The Wyoming Game and Fish Department has specific concerns about excessive timber harvests in the Clarks Fork, Meeteetse, and Trout Creek areas. These problems must be resolved before the final plan is released.

For the timber management plan to work, an effective evaluation and monitoring system must be devised.

PRESCRIPTIONS

The Wyoming Wildlife Federation recommends the following prescription changes. This list includes problem areas identified to date.

1) The lands within and around AA 9 - Table Mountain should be changed from 2A and 7E prescriptions to 3A to protect wildlife and wildlife habitat. 20

2) The Lodgepole Creek drainage in AA 20 - North Absaroka and other nearby lands should be changed from 7E prescription to 3B in unroaded areas and 3A in roaded areas to protect essential elk hiding and escape cover. 21

3) Lands within AA 73 - Swing and AA 77 - Wood River need to be changed from 3A to 3B prescription to protect wildlife and recreation values, and prevent erosion. 22

44-19 "Hiding cover" used as determined by research is enough vegetation to hide 90 percent of a mature elk at 200 feet. Thermal cover defined in Glossary, page VII-6, EIS. We are responding to Wyoming Game and Fish concerns as expressed in their letter. See those responses.

44-20 Crucial preferred winter ranges were identified jointly with the Wyoming Game and Fish Department. For definition of crucial preferred winter range see EIS, Chapter VII, Glossary. The Wyoming Game and Fish Department has temporarily lowered their objective for elk in this area to 200 head. Also, the 7E has been changed to 2A.

44-21 Timber harvesting is an activity that will benefit wildlife through enhanced habitat capability and diversity. Stringent standards for wildlife are incorporated into harvest methods, activities and timing.

44-22 Portions of Analysis Areas 73 and 77 (Swing and Wood River) are classified as 3A. Stipulations attached to the 3A prescription provide for protection of wildlife habitat, recreational values, and soil resources. Any roads that might be developed for timbering or other activities would be closed immediately following the activity.

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4) Roadless lands within AA 150 - Logan Mountain, AA 138 - Dunn Creek, and AA 155 - Trout Creek need to be changed to 3B prescriptions to prevent interference with wildlife and recreational opportunities. **23**

5) The lands on and above Five Mile Creek in AA 185 - Ramshorn need to be changed from 7E to 3B prescription to prevent interference with wildlife and recreational opportunities. **24**

6) The 3A lands above Jules Bowl to Bonneville Pass and lands northwest of Brooks Lake containing the Jade Lakes and Upper Brooks Lake in AA 191 - Wind River should be changed to 3B prescription to protect recreation values and prevent erosion. **25**

7) AA 97 - Meadow Creek needs to be changed from 8C to 8B prescription to protect recreational values. **26**

8) Many of the timber sales scheduled during the first time period need to be delayed or postponed in AA 2 - Basin and AA 4 - Crandall. Essential elk hiding and escape cover must be maintained. Prescription changes are also needed. **27**

9) Several crucial preferred winter ranges are ommitted in the analysis area prescriptions in Appendix J, DP. They need to be identified by the Forest Service and Wyoming Game and Fish personnel and given a 5A or 5B prescription. **28**

CLARKS FORK

The Wyoming Wildlife Federation applauds the efforts of the Shoshone National Forest in its proposed management direction of the 21.5 miles of the Clarks Fork Canyon suitable for wild and scenic river designation. We are currently lobbying Congress to include the Clarks Fork in the Wild and Scenic River System.

WATER AND AIR QUALITY

The management direction of these values appear to be on target providing sufficient funds are available to carry out monitoring and data collecting programs. The WWF is particularly concerned about increased acid rain problems in the forest.

44-23 The Forest Service does not agree with a proposal to change the management direction emphasis in Management Areas 150-Logan Mountain, 138-Dunn Creek, and 155-Trout Creek to a 3B management emphasis. The Logan Mountain area has a very low standard road in it which is utilized by mechanized equipment by the existing range permittee to carry out management activities. The 7E area in the Trout Peak area has been changed to a 3A management emphasis. Existing system trails, developed trailheads, range structures, Robber's Roost cabin, and an outfitter camp precludes these areas from being managed under a 3B emphasis.

44-24 In the 1984 Wyoming Wilderness Act, Congress directed that nonselected roadless areas be released for multiple use purposes, and that "buffer areas" were not to be considered adjacent to wilderness. With this in mind, the Wolf Creek timber sale has been included in the Forest Plan. Planned sales between Five Mile Creek and the Dunoir Special Management Unit have not been included in the Forest Plan; this has been allocated to Management Area 3A rather than Management Area 7E. No logging or road building will take place in the Dunoir Special Management Unit. See also response to comment 44-46.

44-25 The majority of the area in question has been re-allocated to 3A. None has been allocated to 3B.

44-26 Meadow Creek will remain an 8C use area instead of 8B because of its geographical location. That is, it is on the boundary of the wilderness close to a trail head. Historically the closer to a trail head and wilderness boundary an area is, the heavier the use is.

44-27 Timber harvesting is an activity that will benefit wildlife through enhanced habitat capability and diversity. Stringent standards for wildlife are incorporated into harvest methods, activities and timing.

44-28 The only CPWR not identified in Appendix J is in Ghost Creek analysis area. This omission is corrected in Final Plan.

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LANDS

On p. III-167, DP, management prescription 5A sets a standard and guideline which limits acquisition of land needed for big game winter range to areas within the forest boundary. There are many winter range areas bordering the forest which could be eligible for winter range acquisition if this standard were changed to include lands bordering the forest. This adjustment may prove valuable to wildlife in the future.

We recommend land exchange proposals be carefully scrutinized with full public involvement.

29 44-29 The Forest Service cannot purchase lands outside the National Forest boundary without Congressional approval.

GRIZZLY BEAR MANAGEMENT

It is becoming apparent that many areas on the Shoshone National Forest require new or updated habitat situation classifications. This will affect the implementation of the final plan.

We are concerned that the locations and amount of timbering on the Clarks Fork may hamper or prevent the bear's recovery.

The WWF requests new or improved access into Situation I and II areas be avoided. This increased access will increase the chance of human/bear conflicts which have resulted in area closures in the past. Once the public becomes accustomed to using new access routes in the Situation I and II areas they will likely resent the routes being closed after conflicts occur.

30 44-30 Management Situations will be updated as new information and data indicates need for change. See also response to comment 6-1. Access will be carefully coordinated and managed to protect the grizzly bear.

FIRE

Many land managers recognize the role of fire and its benefits and advocate its use as a management tool in forested areas. We support the proposed plan's departure from the current wildfire suppression program which often costs more in dollars and human endangerment than the values at risk.

Sagebrush burning has proven to be an effective way of improving range. However, some areas require sagebrush for big game winter forage or birthing areas. Too much treatment of

31 44-31 All sagebrush burning is coordinated with Wyoming Game and Fish. Wildlife considerations are taken into account.

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sagebrush can lessen the benefits as in the Wood River area where additional sagebrush burning may reduce elk calving areas. 31

BUDGET

The implementation of the proposed plan under all alternatives, except alternative E, is based on the assumption that funds will be available for management programs. An oversight of the proposed plan is the failure to spell out what will happen if funds are not available. In the event of a reduced budget, expenditures would be reduced on a line item basis. Which management programs on the Shoshone National Forest would have budgets reduced first? 32

44-32 The commenter is correct in terms of the budgeting trends of Congress over the last 6 to 8 years. The purpose of the reduced budget alternative was to identify what the Forest would produce if total dollars were reduced 25% from their fiscal year 1982 levels. Geven that, a decision as to how to formulate this alternative had to be made. One method would be to guess at what the priorities of Congress would be when disaggregated from the broad national trends to the Forest. A second would be to formulate such an alternative in a way that it maximized economic efficiency benefit to the American public through management of the Forest under a budget restriction. Given the impreciseness of guesses at Congressional intent over the next 10 years, it was decided that more useful information could be provided by the latter approach. That is what is represented in Alternative E. Part of the analysis of the implementability of this alternative is precisely the point raised by the commenter. This, though, is the same assumption of all alternatives. Further, one of the purposes of Forest Planning is to provide information to Congress on the possible results of their actions. Again the approach taken provides a more accurate picture of what their "best buy" would be if they reduced the Forest's budget. For these reasons, alternative E was formulated as depicted in the EIS.

WILDERNESS

Generally, the WWF supports the proposed direction of wilderness management. Problems which exist or may arise can be dealt with on a case by case basis. It is critical that money is available to insure planning, monitoring, patrolling, access, and trail construction and maintenance of the wilderness system.

It seems unfortunate that very little of the forest was given the management prescription of 3B. This oversight may prove costly to our recreation, wildlife, air and water qualities, and other resources in the future.

OIL AND GAS

In recent years oil and gas stipulations and restrictions on leasing, exploration, and production have been increased in order to protect other resources. Some parts of the forest have been given a No Surface Occupancy classification or have had leasing denied. The WWF applauds these actions. However, we are very concerned that lease stipulations alone may not guarantee protection to other forest resources. In a memorandum dated October 10, 1980, the Acting Regional Solicitor of the Interior Department for the Rocky Mountain Region concluded that the

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Secretary of Interior, "cannot use...[a no surface occupancy] stipulation as an instrument to vitiate the inviolable right to drill given the lessee by the Mineral Leasing Act. Thus, the Interior Department itself has taken the position that once a lease has been issued, the lessee cannot be precluded by means of protective stipulations from exploring for and developing oil and gas reserves.

Further, major conflicts between explorationists and other forest users have occurred in the Cody and Meeteetse areas because some parts of the forest have been leased without regard to the cumula'ive impacts of oil and gas activities.

In the future, the Forest Service should do an environmental assessment on each area of the forest examining the cumulative effects of oil and gas exploration and development before making a recommendation to lease in that area. This environmental assessment should include a worst case scenario in which field development drilling and production activities take place. If any significant damage to other forest resources including wildlife is anticipated in the environmental assessment then no leasing or seismic exploration should be allowed in the area.

The Wyoming Wildlife Federation is alarmed by the following statement: "Perhaps the most significant impact minerals development could have on the timber resource is the effect of increased roading, especially in previously unroaded areas. Timber whose value could not justify roading and harvest on its own merits, may well become practical to harvest when a minerals-related access road is constructed". (Page IV-63, DEIS) This statement represents a vain attempt to economically justify timbering and road building by tying these activities to the coattails of the powerful oil and gas industry. It also betrays the writer's total disregard for the resulting cumulative impact on other forest resources. We have actively opposed this kind of Forest Service philosophy in the Bridger-Teton National Forest, and sincerely hope it will never become part of the Shoshone National Forest management direction.

32a 44-32A The Errata sheet to Proposed Plan Appendix K and Appendix K of the Forest Plan outlines the process for developing lease recommendations. Lease recommendations consist of a set of stipulations and recommended operating procedures which are deemed as possibly necessary to meet the objectives of the Plan for other resources. Actual exploration and development proposals require additional environmental analysis and determination of cumulative effects that could result in a cap on activities within a given area. This determination would include wildlife population objectives within a herd unit, or other resource objectives affected by incremental development through time.

33 44-33 Wording has been changed accordingly.

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OUTFITTER CAMPS

There are several new or currently unused outfitter/guide camps available in the proposed plan. The WWF recommends no new or currently unused outfitter/guide camp permits be issued on the forest. Additional outfitter/guide camps on the Shoshone National Forest will cause conflicts with resident hunters and existing outfitters.

1) The proposed camps located in AA 184 - Ramshorn, AA 190 - Wiggins Fork, AA 198 - Washakie, AA 192 - Bear Creek, AA 191 - Wind River, and AA 188 - Warm Springs are "drive to" camps or near roads where hunting pressure is already high. The big game harvest in these areas is adequate. Several of these camps would conflict with existing outfitters and cause conflicts with resident hunters.

2) The Simpson Lake campsite, AA 197 - Simpson, was shown on a list obtained from the Forest Service as a new camp. According to p. J-274, DP, an existing permit will terminate in 1990. If the permittee, the C-M Ranch, Dubois, wishes to give up its permit in 1990, we recommend against reissuing the outfitter/guide permit on grounds of existing high use of the area, conflicts with resident hunters and other outfitters, and limited horsefeed. **34**

3) Page J-270, DP, AA 194 - East Fork, lists an available outfitter/guide camp. We are told by the Forest Service this is an error and no new camp exists. Again, a new camp in this high use area would conflict with existing outfitters and resident hunters.

4) Page J-146, DP, AA 97 - Meadow Creek, does not list an existing outfitter/guide camp. **35**

5) Page J-188, DP, AA 117 - Dry Creek, allows for an outfitter/guide camp permit which is currently unissued. The WWF recommends withdrawing this permit. Despite its remoteness, the area is receiving considerable increased use from existing outfitters and residents.

CONSULTATION WITH OTHER AGENCIES

During conversations with Wyoming Game and Fish personnel, many concerns and problems with several areas of the plan led us to the conclusion that an apparent lack of communication exists in the planning process of timber sales, road construction and **37**

44-34 The public response to the proposed new outfitter/guide camps has been overwhelmingly negative. Therefore, no new outfitter/guide camps are allocated in the Final Forest Plan.

44-35 The Plan identifies a potential outfitter/guide camp near Moose Lake in Dry Creek. We believe this can be a viable operation. The camp in Meadow Creek is not identified because it does not meet the criteria for a large group camp as shown in EIS, Appendix H. The camp at Moose Lake will replace the existing Meadow Creek Camp.

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closures, mineral leasing, and livestock and wildlife allotments. This problem must be resolved before the final plan is released. | 37

44-37 See response to Wyoming Game and Fish comments.

MONITORING AND EVALUATION

The successful implementation of the plan hinges on monitoring. (See CHEC, p. 17-18)

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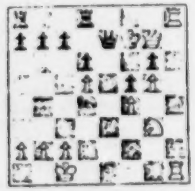

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FPD-49-W-1-E
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9 August 1985

Review of the Draft Shoshone Forest Plan and EIS

Summary

The Shoshone National Forest Plan and the alternatives considered in the EIS are based largely on a complex computer model called FORPLAN. Unfortunately, the Shoshone FORPLAN model contains several failings which greatly reduce the value of the results.

Chief among these is the lack of important alternative prescriptions. Recreation and wildlife produce the greatest economic values on the Shoshone, while timber costs more than it returns and grazing costs more than it is worth. Yet no "custodial" prescription -- leaving some roads open for recreation without accompanying timber harvests — is considered in FORPLAN.

As a result, nearly all alternatives in the EIS propose to manage most available forest land for timber. The one exception is a "low-budget" alternative which, since funds for timber management are limited, requires that most roads be closed and produces little recreation. The obvious alternative of leaving some roads open for recreation without selling timber is not considered.

The model also overestimates many economic values. Values of timber, grazing, and water are far too high. Correcting these values, and adding new "custodial" prescriptions, would result in very different FORPLAN runs.

The Forest Service has argued that timber management benefits recreation and other resources and protects local communities. CHEC found that these benefits are largely nonexistent on the Shoshone.

For example, Forest Service data not included in the EIS indicate that no new roads are needed for recreation. The existing road network has a capacity some 40 times greater than projected roaded recreation demand over the next 50 years.

Sales of timber under the proposed plan will provide about 56 direct jobs to the local economy. CHEC estimates these sales will cost taxpayers over $160,000 each year, meaning each job will cost an average of $3,000 a year. This cost has a capital value of $75,000. Far more jobs might be produced if this money were invested in recreation and wildlife rather than timber.

Planners should correct the problems in the FORPLAN model and test whether new FORPLAN runs are sensitive to these changes. If so, benchmarks and alterratives should be re-run. This is likely to produce a wider range of alternatives and improved information for making the final decision.

A Publication of Forest Planning

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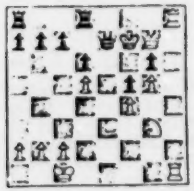

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9 August 1985

Review of the Draft Shoshone Forest Plan and EIS

The Shoshone National Forest borders the east side of Yellowstone National Park and is entirely within the State of Wyoming. The Greater Yellowstone Coalition asked CHEC to review the Forest Plan and environmental impact statement (EIS) after they were released in June 1985.

CHEC visited the Shoshone Supervisor's office on July 16th through 18th, 1985. CHEC examined FORPLAN runs, relationships between timber and other resources, timber yield tables, recent timber sale information, data on grazing and recreation values and capacities, and other information pertaining to the Plan.

FORPLAN is a computer program used by the Forest Service to assist in making decisions about land allocations and timber harvest scheduling. Shoshone Forest planners used a version of FORPLAN known as "direct entry" FORPLAN.

CHEC's review of the Shoshone Plan and EIS will focus on identifying and correcting weaknesses of the FORPLAN model. The review will also attempt to estimate the effects of these corrections and make recommendations for improving the FORPLAN model and the Plan itself.

The FORPLAN Model

To use FORPLAN, planners must divide the forest into "analysis areas." Yield tables for timber, grazing, and other resources are prepared for each analysis area or group of analysis areas. The relationships between resources, such as the effect timber has upon recreation and wildlife, are also estimated. This information is entered into the computer.

Economic values for the various resources produced on the forest are also entered into FORPLAN. Values and costs are applied to recreation, grazing, water, and timber. All but the timber values have been determined by the Washington, D.C., office of the Forest Service in its RPA [Resources Planning Act] Assessment. Timber values are determined by the planning team.

Planners identify a number of prescriptions for managing each analysis area. Prescriptions may include maximum timber outputs, protection of roadless areas, minimum level management, or a variety of other strategies. Associated with each prescription are a set of costs and outputs. Outputs may range from timber to sediment to recreation visitor days. Where appropriate, the outputs are associated with dollar values.

Planners then "run" FORPLAN, effectively asking it to propose an alternative combination of prescriptions which reaches some objective. The objective may be to maximize timber sales, minimize sediment production, or maximize or minimize other outputs or costs. The most frequent objective is maximizing the economic value of the forest ("maximize present net value" or PNV).

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Planners can also place limits or "constraints" on FORPLAN costs or outputs. One common constraint requires that timber sales be "nondeclining," that is, that they may increase or stay the same, but not decrease over time. Other constraints may place "ceilings" on the budget, "floors" on acres allocated to grazing or other upper or lower limits on other resources.

Most alternatives are designed by requiring FORPLAN to produce a specified amount of certain resources, or to allocate certain lands to a given use. FORPLAN is then asked to maximize the present net value of the forest subject to these constraints.

Consequently, within the limits imposed by the constraints, FORPLAN will tend to allocate land to that prescription whose net values are greatest. FORPLAN also estimates the amount of a particular resource that can be produced each year for the next 200 years.

The Shoshone FORPLAN Model

CHEC's review of the Shoshone FORPLAN model found problems with the yield tables, the assumed relationships between timber and other resources, the prescriptions, and the economic values. Each of these will be discussed below along with other relevant information about the Shoshone model.

1. Analysis Areas

Shoshone planners divided the Forest into 109 analysis areas with boundaries based on geographic features. Consequently, analysis areas are contiguous to one another and may contain roaded and roadless land, range, wilderness, land suitable and non-suitable for timber management, etc. Because 57 percent of the Shoshone National Forest is designated Wilderness, some analysis areas are entirely Wilderness.

Scattered within some of these analysis areas are stands of timber considered tentatively suitable for timber management. Only about five percent of the Forest fits into this category. Planners built a separate FORPLAN model, with separate analysis areas based on forest type, of these forest lands to schedule timber harvests.

2. Yield Tables

Specific yield tables are included in the Shoshone model only for timber and domestic grazing. Other resource outputs are entered into prescriptions as fixed yields for each analysis area.

CHEC reviewed the timber yield tables and concluded that they overestimate the productivity of future timber stands. This is not a critical problem, because timber harvests in the next ten years are limited by the volume of timber now standing in the Forest, rather than by future growth potential. However, projections of later decade harvests are probably too high.

38

44-38 FORPLAN was the analytical model used to convert Forest supplied information on coeficients for costs, outputs, and benefit values into appropriate rows and columns for solution using an operations research solution procedure referred to as Linear Programming. This model has the ability to automatically generate information for such rows and columns using either yield tables or directly entered information. The choice of how to enter the data and use the model to generate appropriate rows and columns is the choice of the user. Some outputs are based soley on the condition of a single acre such as timber produced on an acre or forage for cattle and wildlife. These "per acre" types of production are most efficiently handled using "yield tables" within the model with little distortion of results. Other outputs such as wildlife habitat, visual quality and recreation opportunity are not easily represented as per acre outputs. Rather, they are a function of vegetation patterns and such things as distance to open water, trails and recreation facilities. To adaquately represent these outputs and effects, the condition of an analysis area that would be created through the practices within a prescription were estimated by resource specialists using a variety of analytical models. These estimates were then "directly entered" into the model. Because they were directly entered, no automatic yield tables were needed to fully represent them in the model. Over 70 outputs and effects were included in the FORPLAN models used for analysis. See also response to comment 44-39.

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Planners used two computer models to predict future yields: R2-GROW, a model developed by Region 2 timber planners to predict the growth of existing stands of timber, and RM-YLD, a model built by the Rocky Mountain Forest and Range Experiment Station to predict the yield of second-growth stands. CHEC examined the R2-GROW runs, but planners were unable to locate any of the RM-YLD runs for CHEC to examine. 38

Standard growth models indicate that a given piece of land or "site" is capable of growing trees to a roughly fixed height over time. Using an "index age" of 100, if a site can grow trees to be 80 feet tall in 100 years, it is said to be "site index 80." Site index is one measure of productivity.

Height is not the only factor which affects volume. The diameter of a tree obviously has a major effect on the volume of that tree. The number of trees per acre times the average stand diameter will effect the volume of that stand of trees.

Forest mensurationists have found that, for a given site, the relationship between the number of trees per acre and average stand diameter remains relatively constant over time. When graphed on a logarithmic scale, as the diameter increases the number of trees decreases on a straight-line relationship.

An index of the number of trees per acre at an average diameter of 10 inches is called stand density index (SDI). In general, such an index is a measure of the stocking capacity of a site.

Forest inventory data indicate that the SDI of existing mature Douglas-fir stands is about 230. If computer yield models accurately reflect site capabilities, this SDI will remain relatively constant over time unless the site is disturbed by a thinning or other activity.

Yet the R2-GROW runs did not show a constant SDI for Douglas-fir stands. Instead, the SDI increased to as high as 370 over time. The program apparently assumes that sites can grow to greater stocking levels than the SDI indicates. Such a 60 percent increase over the current SDI is extremely unlikely to occur in reality.

Since the RM-YLD runs were not available, CHEC was not able to determine whether they similarly overestimate site productivity. However, CHEC's review of other forest plans which used RM-YLD found similar problems.

According to the author of RM-YLD, Carlton Edminister, RM-YLD assumes that all sites are capable of growing to a given level of stocking. Edminister recognizes that some sites cannot grow to this stocking level, and a revised version of RM-YLD allows the user to enter a reduction factor to account for these sites.

However, Shoshone planners used the early version of RM-YLD, and so could not make this adjustment. Presumably, then, Shoshone yield tables made using RM-YLD are based on an overestimated stocking capacity and therefore overestimate future harvest levels.

39

44-39 R2GROW is a model used to estimate timber growth and response to management activities. The base parameters for this model come from actual stand data from the Forest. Because of the silvicultural prescriptions modeled for planning included treatments such as thinning, a comparison of a single factor across the full range of yield tables can result in an inaccurate conclusion regarding such estimates of growth and yield. The growth and yield projections from both R2GROW and RMYIELD were checked against actual stand data for accuracy before they were used as inputs to planning. Discrepencies were resolved at that point in time as shown by the many minor differences between results of these models and the yield file coefficients used in analysis.

Verifying the accuracy of all estimates of costs, output levels and effects for all goods and services included in planning is a major feature in monitoring and evaluation of Plan implementation. When inaccuracies in such estimates effect the long term mix of goods and services that will be produced, the Forest is obligated to amend or revise the Plan. This is true of estimates of growth and yield estimates for timber as it is for all other costs, outputs, effects and benefits.

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Again, these problems do not indicate that levels of timber sales proposed in the next ten years are too high. They do indicate that projections of future sale levels may be too high. Even after correcting any errors in the yield tables, however, it is likely that the proposed sale level of a given alternative could be maintained indefinitely. 39

3. Relationships Between Timber and Other Resources

In addition to timber and grazing, recreation, wildlife, and water are all important resources produced by the Shoshone Forest. Rather than have separate yield tables for these resources, planners assumed that these outputs varied by prescription. Implicit or explicit assumptions about the relationship between these resources and timber were often incorrect.

Recreation is assumed to improve because roads constructed and maintained primarily to access timber will increase capacity for roaded recreation and provide better access to roadless areas as well. Planners say wildlife will benefit because cutting timber will increase ecological diversity.

Finally, water yield is expected increase due to timber harvest because less water is "lost" through evapotranspiration and other processes. Each of these assumptions, however, is flawed in one way or another.

Recreation-Timber Relationships: In the EIS, planners imply that recreation, particularly motorized recreation, will benefit from roads built for timber management. For example, in the description of alternative E (reduced budget), the EIS notes that

> Because of lower amount of trail maintenance, reduced access, and lower expenditures for recreation use management, the recreation experiences offered will shift toward primitive experiences of low quality [EIS page II-26]. 40

The result, according to table II-5 of the EIS (page II-51), is that alternative E -- which is the only alternative with significantly reduced timber sale levels -- is also the only alternative with significantly reduced recreation outputs.

This assumption that timber sales benefit recreation was not explicitly put into FORPLAN; that is, high levels of recreation were not directly tied to high levels of timber or road construction. However, the assumption was implicitly made in the FORPLAN prescriptions, which either provided high levels of both timber and recreation, or no timber and minimal recreation.

This practice effectively results in FORPLAN assuming a positive relationships between timber harvest and recreation opportunities and proposing to build and reconstruct the yearly average of 13.3 miles of roads for the next 50 years, as outlined in the preferred alternative. A more detailed discussion of this problem is included in the discussion of prescriptions below.

Wildlife-Timber Relationships: Timber management inevitably affects the wildlife resources of a forest. Shoshone planners generally assume these effects are beneficial to wildlife, creating a positive timber-wildlife relationship.

44-40 See response to comment 44-1.

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In chapter four of the EIS, planners recognize the limitations of this relationship: "Due to the large amount of early successional stages and natural openings on some part of the Forest, not all acres clear cut would directly benefit wildlife as cover may be the limiting factor in some of these areas."

However, planners on the Shoshone National Forest still assume that diversity of habitat can be improved by placing small, irregular clearcuts in a contiguous stand of mature forest. "Trees would be harvested by clear-cutting or group selection methods to create permanent of temporary openings to enhance wildlife habitat diversity," says the EIS (page IV-31). 40

This assumption was incorporated into FORPLAN by telling the model that an area will experience less wildlife user days if part of the area is managed for Wilderness rather than as general forest. Because FORPLAN is affected by the dollar values attached to user days, the model tends to use timber management to produce more wildlife and greater economic values.

Accordingly, planners and biologists on the Shoshone Forest propose to harvest patches of timber mainly to optimize habitat for elk. Research in northeastern Oregon determined that optimum elk habitat there consists of 60 percent open areas for forage and 40 percent cover for protection from weather (thermal cover) and predators (hiding cover). These findings are described in Forest Service Handbook No. 553, edited by Jack Ward Thomas.

When proposing to improve forage:cover ratios through silvicultural techniques, the Shoshone Plan overlooks the fact that an improvement will only result if forage limits elk production. Also overlooked is the fact that canopy closure of thermal and hiding cover should be at least 70 percent if optimum elk habitat is to be provided (Handbook No. 553, pages 115-119). 43

The Shoshone National Forest, however, is naturally quite open. This condition is reflected in the fact that planners consider only about five percent of this Forest as tentatively suitable for timber management. This indicates that at least 95 percent of the Forest is either natural openings or poorly stocked forest land providing forage but poor thermal cover.

Thus, other than riparian areas, the best areas on the Shoshone Forest for closed-canopy thermal cover may be the tentatively suitable commercial timber lands. Of these, areas stocked with conifers currently 40 to 80 years old are the best. These areas make up 22 percent of the tentatively suitable lands, but will be reduced to 20 percent under the preferred alternative (draft EIS, page II-64).

These figures indicate that the primary limiting factor for elk on the Shoshone is cover and not forage. Timber management will therefore degrade rather than improve elk habitat and should not be considered beneficial for elk.

The roads needed for timber harvests will have an additional effect on elk habitat. Chapter eight Handbook No. 553 points out that the effectiveness of elk habitat will be reduced by up to 50 percent if road density reaches three miles of road per square mile of land.

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44-43 From a forestwide perspective, the limiting factor for such species as deer, elk and bighorn sheep is winter range not cover. However, preserving cover is of general concern forestwide in order to provide the optimum 40% 60% cover to forage ratio. There are many areas on the Forest where just the opposite situation exists. In these areas, timber grows well and the ratio is skewed toward too much cover. This is of particular concern along migration routes between summer and winter ranges. In these areas, standards for timber harvest are imposed which call for harvesting in such a way as to have optimum benefit for wildlife. The amount of this forestwide is insignificant given that less than 0.4% of the Forest will be harvested in any single 10 year period. The effect can be quite significant, though, in specific areas on the Forest. Because of this, these standards were chosen and the benefits to deer and elk were included in Chapter IV of the EIS.

When dealing with such considerations of cover to forage ratios, forestwide statistics provide little aid. The specific patterns of vegetation within a relatively small area (5000 to 10,000 acres) must be examined. Models and analysis used in formulation and analysis of alternatives dealt with these considerations on an analysis area by analysis area basis, often moving to subanalysis area levels of site specificity. (Appendix B discusses analysis areas, generally they are 10,000 to 50,000 acres of contiguous areas on the Forest as shown in the analysis area map included with the Plan.) Approaching formulation and analysis of alternatives in this manner allowed for moving away from forestwide statistics and dealing with the specifics of each area in a realistic manner. Therefore conclusions based on forestwide statistics may have little validity without in-depth review of analysis area by analysis area results. (Management strategies for the first 10 years for each analysis area are presented in Appendix J to the Plan.)

We agree with the reviewer in terms of the effects of open road densities on wildlife, specifically elk. For that reason, the plan imposes seasonal road closures on all roads passing through crucial preferred winter range and calving areas. Further, the plan calls for all roads built for timber management alone, to be closed to public use. Analysis of the costs of constructing and managing such roads was included as part of the analysis of the planned timber harvest schedule. The only areas selected for timber management were where timber harvest alone could pay for the required roads. This is the primary reason over 55,000 acres of tentatively suitable timberland are not included as part of the suited base to be managed for timber production.

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Research in western Montana, where forests are less dense than in Northeastern Oregon, indicates that habitat is reduced by 50 percent from only two miles of road per square mile of land. Shoshone Forests are even less dense than western Montana, so very few road miles can have a major effect on elk.

Dividing current road miles on the Shoshone (draft EIS, page III-67) by the number of square miles available for roaded recreation (draft EIS, page II-85) yields a road density of 2.1 miles of road per square mile of land, not including primitive roads. At best, then, elk habitat on roaded land in the Shoshone is 75 percent effective and may be less than 50 percent effective.

Planners should incorporate a habitat effectiveness index into FORPLAN. The index would vary based on current forage:cover ratios, distribution of openings, road density, and other factors. Using this index, FORPLAN would in many cases find that roads and timber harvests will reduce rather than improve elk habitat.

Road closures, rather than road construction and timber harvest, are likely to have the greatest returns in elk habitat improvement. Closures are expensive and difficult to enforce: as timber receipts cannot even pay for new road construction, it is impossible to expect them to cover the costs of enforcing road closures. 43

Other habitat improvements can be achieved by reducing livestock grazing. For example, planners claim that the Forest cannot maintain herds of elk and bighorn sheep on the North Fork of the Shoshone River. The Wyoming Department of Game wants the Forest Service to provide winter range for 1,800 to 2,200 elk in this area, yet the Shoshone Plan does not reduce livestock grazing in favor of elk or sheep.

The area along the North Fork, as most bottom lands, is considered "crucial preferred winter range" (CPWR) for elk, and wildlife forage therefore must take precedence over livestock forage. While planners propose to close a few grazing allotments to livestock in favor of wildlife, the preferred alternative would still provide enough forage to support only 63 percent of the number of elk targeted by the State.

Yet under the "reduced budget" alternative, 92 percent of the target elk herd are supported. Considering that this alternative still allows some livestock grazing along the North Fork, all elk could be accommodated if livestock grazing were eliminated.

Shoshone wildlife biologists plan to improve wildlife habitat by cutting or burning old stands of aspen or willows. This practice may provide additional forage for elk and moose and possibly improve the condition of the winter range. However, biologists agree that uncertainty exists in the effectiveness of this program.

The Shoshone Forest is extremely arid and there is a limited amount of aspen and willow present on the Forest. Even if all patches of aspen and willow could be treated successfully, the net improvement of habitat and subsequent improvement of winter range condition may remain unnoticeable.

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Increased forage created by the aspen/willow program may be offset by lost cover. The riparian areas in which aspen and especially willow are generally found provide some of the best cover on the Forest. With cover such a limiting factor, the aspen/willow program may be counterproductive. 43

Water-Timber Relationships: Planners explicitly assumed that "Timber harvest activities would increase water yield" (EIS page IV-46). Table IV-15 (EIS page IV-50) shows that, after 50 years, the increase in some alternatives is more than five times that of other alternatives. However, in no alternative is the total increase more than 0.2 percent of the total production of water from the Forest.

While there is little question that timber harvests, particularly clearcutting, will cause some increase in water yields, there is a serious question of whether that increase has any value. This is discussed in detail in the description of FORPLAN economic data below.

4. Economic Values

Except for timber, most resource values were based on the 1985 RPA Program. This Program is a national plan for Forest Service activities which is updated every five years. The values of four resources will be discussed here: timber, grazing, recreation, and water.

Timber values: Timber values used by planners in FORPLAN ranged from $176 to $267 per thousand cubic feet. As there are about 4.5 board feet per cubic foot on the Shoshone, this ranges from about $39 to $59 per thousand board feet. The lower values are for timber on steeper slopes, which are more costly to log, and for commercial thins, which have smaller diameters as well as being costly to log. 44

Since most timber sold today is final harvests on gentle slopes, not commercial thins or harvests on steep slopes, the higher values -- $49 to $59 per thousand board feet -- should be reflected in current timber sale prices. To test this, CHEC examined sale records for all major sales sold between 1977 and the present. This data is summarized in table one.

This table shows that the values used in FORPLAN reflect bid prices between 1977 and 1980, which averaged about $70 per thousand. However, the recession dropped bid prices after 1980 by more than 50 percent, to less than $32 per thousand.

The sale records examined by CHEC indicate the high bid price, but not the actual sale price. Forest Service sale contracts allow price adjustments with changes in the market, so it likely that many of the purchasers of timber sold between 1977 and 1980 actually paid far less than the high bid price.

Which prices are more reflective of the future? Certainly the prices since 1981 are the best indicator of prices in the near term, since there is no sign of a major recovery in the timber industry.

Forest Service Response

44-44 In response to this comment, a check with timber mills using timber from the Forest was made. Most of these mills are small operations specializing in dimension lumber and/or specialty products. They report that their markets are good and improving with current orders for most if not all of their planned work. Also, a check was made of trends in stumpage prices over the years since the depressed market to that sold in 1985. These sales showed that for green timber, stumpage prices had risen to their pre-1980 levels. Given both of these pieces of information, there did not appear to be sufficient justification for changing the statistically supported stumpage values included in analysis. While the reviewer may be correct in terms of his projections of the national timber market, these are general tendancies that do not appear to be supported by the facts specific to the timber markets for this Forest.

The commenter states that stumpage prices as included in FORPLAN "... easily cover all timber and road costs." Further that it would take a 50 percent to 60 percent reduction in stumpage prices before income fails to cover new road construction. Given the market for the products produced by mills operating off of the Forest, a drop of 50 percent in prices in the forseeable future appears unlikely. In the event that such a drop occurs and persists for 3 to 5 years, a reanalysis of timber management on the Forest is mandated.

In reanalysis of timber based on this and other comments, the acres of suited timber were reduced by approximately 15 percent . Acres no longer included in timber management included some areas not currently accessible, some areas of low value and slow growing timber, and some areas on slopes of 40 percent to 60 percent. This appears to address some of the concerns voiced in this comment.

The commenter states that "... thinning is another activity which probably cannot be justified ...". Timber management regimes were analyzed for economic efficiency at least 4 times using a wide variety of modeling techniques (see Appendix B in the EIS). In each case, results of analysis show that commercial thinning of some stands is economically viable, reduces risk to some insects and disease, and improves health and growth of residual stands. The Plan calls for thinning only those stands where such operations are economically viable.

The Forest Service finds no compelling reason to reduce timber harvest to levels below what analysis shows to be a positive economic return.

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Nor is such a recovery likely to occur in the foreseeable future. High timber prices during the 1970s were largely due to major Federal subsidies to the housing industry and strict regulation of the banking and savings and loan industry. Many of the subsidies have been eliminated and the savings and loan industry has been deregulated.

Table One

Average High Bid for Live Timber
Shoshone National Forest
(1982 dollars per thousand board feet)

Year	Bid
1977	$63
1978	79
1979	79
1980	40
1981	13
1982	3
1983	65
1984	26
1985	47
Average 1977-80	70
Average 1981-85	32

As a result, housing costs are likely to remain high and the quantity of housing demand low for some time. There is little the Forest Service can do to change this trend. To reflect these changes, planners should reduce timber values in FORPLAN by about half.

The data in table one represent only live timber values. Dead timber -- trees killed by insects, disease, or natural attrition -- accounted for 15 percent of the volume sold between 1977 and 1985, and sold for an average of less than $1 per thousand board feet in 1982 dollars.

Planners made no provision in FORPLAN for dead timber, yet if the volume losses to mountain pine beetle and other pests is as significant as claimed in the EIS, not all of the timber in the yield tables will be recovered in live form. This implies that values may be an additional 15 percent too high.

These changes in values would make a significant difference to FORPLAN solutions. The preferred alternative FORPLAN run projects timber revenues to average about $550,000 a year with little variation over the next 100 years. Timber costs, other than roads, average about $185,000 a year.

Road costs, however, average nearly $330,000 a year over the next 50 years. These costs will decrease to $75,000 after 50 years, making the average for next 100 years over $200,000 a year.

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As will be discussed below, except some of the maintenance costs — perhaps $25,000 per year -- most of these road costs are attributable strictly to timber management. The timber values used in FORPLAN easily cover all timber and road costs. But if the values are reduced by 50 to 60 percent, they will fail to cover any new road construction costs.

Even in some areas where new road construction can be minimized, timber values will fail to cover costs. For example, FORPLAN allocated several thousand acres of steep slopes to timber management. The expensive machinery required to remove timber from such slopes cannot be justified by the value of the timber.

Commercial thinning is another activity which probably cannot be justified even under the most ideal circumstances. Timber values are simply too low, and the costs of removal too high. This makes the 1847 acres of commercial thinning proposed by FORPLAN in the next decade a certain money loser.

Revised timber values, then, would lead FORPLAN to avoid roadless areas, steep slopes, commercial thinning, and other areas and activities which tend to be more costly. Some timber harvesting in the form of clearcutting might be proposed on gentle slopes which are already developed.

Grazing values: Although the Forest Service only receives $1.35 per animal unit month (AUM) from ranchers in 1985, planners assume that this is far below the fair market value for grazing. For the economic analysis to represent true social benefits, rather than merely income to the government, fair market value should be used instead of actual receipts.

For the draft Plan, planners assumed domestic grazing to be worth $9.09 per AUM, which is the 1985 RPA value in 1982 dollars. This estimate has been refined by the **1985 Grazing Fee Review and Evaluation** which was prepared by the Forest Service and the Bureau of Land Management at the request of Congress. The **Review** estimates that the fair market value of grazing on the Shoshone Forest in 1982 dollars is $6.57.

According to FORPLAN, providing 81,300 AUMs on the Shoshone will cost $547,000 or $6.73 an AUM. Planners estimated receipts would average $1.40 an AUM for total receipts of $114,000. However, at the 1985 receipts of $1.35 an AUM, adjusted to 1982 dollars ($1.21 an AUM), receipts would only be $98,000.

Using the 1985 RPA value, grazing on the Shoshone Forest will be worth $741,000, which is $194,000 more than cost. Given this high value, FORPLAN willingly allocated a considerable amount of land to grazing.

Using the $6.57 value, however, grazing of 81,300 AUMs will be worth only $534,000, which is $13,000 less than cost. If this value were used in FORPLAN, the program would recommend significant reductions in domestic grazing.

In short, the Shoshone National Forest is losing money on grazing, subsidizing livestock operators with tax dollars. It is also spending more than the total social value of domestic grazing.

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Forest Service Response

44-45 It appears that the commenter misread the output from FORPLAN on range management costs and AUMs of domestic livestock to be produced over the first 10 years of the plan. Range management costs from FORPLAN are $155,100/year. Even when overhead such as vehicles and planning are added in, these costs are $259,000 not the $547,000 reported in the comment.

Production of AUMs is 83,057 AUMs/year and not the 81,300 AUMs reported in the document. This means that direct revenues should be $100,499 from range if the 1985 grazing fee is used ($1.35/AUM discounted to 1982). When the 1985 RPA value for range is used, total benefits to the American public of this range program would be $754,986 or almost 3 times higher than costs. If data from the 1985 Grazing Fee Review and Evaluation is used for total benefits, then total benefits from this program would be $545,683 or about twice the total cost. Either way, there is no subsidy of the range program and total costs are far below total social value of domestic livestock grazing.

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Recreation Values: As shown on page B-33 of the EIS, planners assumed that recreation values range from about $9 a visitor day (for "rural recreation") to $41 a visitor day (for big game hunting). These numbers were based on estimates made for the 1985 RPA Program.

Although a plan could be written which provides huge capacity for one form of recreation or another, capacity alone has no value unless it is actually utilized. Economists call a good whose capacity is far greater than its use a "free good." The value of added capacity for such a good is zero.

For this reason, and because Forest Service officials often claim that road construction for timber has side-benefits for recreation, it is useful to compare the capacity of the Shoshone Forest for various forms of recreation with the current and anticipated future use. Tables III-6 and III-7 of the EIS (pages III-22 and III-23) present the current and estimated future roaded, semi-primitive, and other recreation use of the Forest.

These classes of recreation are based on the Forest Service's "recreation opportunity spectrum" (ROS) classification. "Primitive" refers to wilderness-type use. "Semi-primitive" refers to roadless use, either with or without motorized vehicles. "Roaded natural" refers to most road-related recreation. "Rural" refers to highly concentrated roaded recreation.

A complicated formula for determining dispersed recreation capacity can be found on page III-19 of the EIS, but no results of the formula are given. The same is true in the Plan itself, which replicates the formula on page II-25 and the use data on pages II-28 and II-31, but does not show capacities.

CHEC reviewed an additional document, the "analysis of the management situation" (AMS), for information on capacities. Again, use data was presented, the capacity formula recited, but the results of the formula were not shown.

Finally, CHEC reviewed planning files on recreation. One of these files included a printout of the capacity formula, factors entered into the formula, and the results of the formula. These are summarized in table two, which also shows current and future use.

Table Two
Existing Capacity and Current and Future Use
of Dispersed Recreation by ROS Class
(thousands of recreation visitor days)

	Current Use	Use in 2030	Capacity
Primitive	1.2	5.7	2,631.1
Semi-primitive non-motorized	32.9	79.4	6,636.2
Semi-primitive motorized	124.4	548.0	6,695.6
Roaded natural	394.8	1,292.2	56,623.3
Rural	342.5	443.5	9,073.4

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Forest Service Response

44-46 Demand cutoffs were used in all alternatives which means that excess capacities were not valued.

Roads needed for timber were not the controlling factor in design of prescriptions but rather the mix of recreation opportunities needed or targeted. Roads only benefited recreation if they helped achieve the targeted recreation opportunity. (See response to comment 182-5)

The need for redistribution of use (redistribution of opportunities) was often the reason for the targeted ROS classes in an area being different from what currently exists.

Predicted use and recreation capacity figures have been corrected in FEIS tables IV-4 and IV-7. Capacity exceeds predicted use in all ROS catagories and to a greater degree in nonmotorized nonwilderness recreation than in motorized recreation.

The alternatives contained in the DEIS offer a balanced mix of recreation opportunities from the most highly developed (rural) to the most undeveloped (pristine wilderness) based on analysis of area-specific and forestwide historical and projected use. The mix of recreation opportunities provided by the alternatives in the FEIS has not been changed significantly. The capacity for roadless recreation exceeds projected use to a greater extent than the capacity for roaded recreation exceeds projected use. (Refer to table below). In addition, problems of concentrated use in the roaded recreation categories call for a better distribution of opportunities in order to provide the high quality of recreation opportunities intended in the preffered alternative. To keep all currently roadless areas roadless limits opportunity to meet demand for high quality recreation in other recreation categories.

FACTOR BY WHICH CAPACITY IS GREATER THAN USE*

	NONWILDERNESS		WILDERNESS		
Alternative	Motorized	NonMotorized	Semi-Primitive	Primitive	Pristine
A	2.9	2.1	1.2	8.6	2.0
B	3.3	4.8	1.2	8.5	2.1
C	3.4	5.5	1.4	8.5	1.6
D	3.4	5.5	1.4	8.5	1.6
E	3.1	3.0	0.86	4.0	1.4
F	3.3	4.5	1.32	8.2	2.1

*From FEIS tables IV-4 and IV-7, first decade figures.

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As shown in the table, the capacity of the Shoshone for all forms of dispersed recreation is far greater than the existing or projected use. This is true even if all the capacity figures are overestimated by ten times.

The roaded recreation capacities in particular (roaded natural and rural) are 20 to 40 times projected use. This clearly indicates that no new timber roads will produce any net recreation benefits. Although recreationists may use those roads, such use will merely be transferred from one part of the Forest to another. 46

Water Values: Shoshone planners assumed water is worth $45.50 per acre-foot, a value taken from the 1985 RPA Program. This is significantly higher than the $5 per acre-foot value used in the 1980 RPA Program. RPA values apply to an entire Forest Service region; thus, the $45.50 value may apply in eastern Colorado but not in Wyoming.

In addition, as CHEC's review of the draft 1985 RPA Program has shown, the $45.50 figure represents the gross value of water delivered to an irrigator. This is inconsistent with all other values used by the Forest Service, which represent the value of resources at the point of extraction from the Forest. To make them comparable, all the costs of delivery of water from the Forest to irrigators must be deducted.

A major delivery cost is in water storage. Since most additional water produced as a result of timber harvesting runs off in the spring, but is needed by irrigators in the late-summer, storage facilities are needed to hold the water.

Yet according to Robert Rossman, hydrologist on the Shoshone planning team, no such storage facilities exist for many watersheds on the Forest. Where storage facilities are found, they often are already filled to capacity.

Consequently, additional water storage and delivery facilities will be required to produce any water values. The costs of these facilities must be deducted from the $45.50 -- and the net value is likely to be negative. 47

Although the additional water value produced by timber harvest operations is insignificant, planners should eliminate, or at least substantially reduce, any dollar values for water from FORPLAN. Forest officials should also take care not to claim that water production is a side-benefit which makes timber management worthwhile.

5. Prescriptions

Prescriptions are developed for each analysis area. They are like a recipe, describing what kind of activities will be undertaken and how these activities will be carried out.

For example, one prescription of an analysis area may require that a certain amount of acres of suitable forest land will be harvested using certain logging techniques. For some analysis areas the same prescription may be chosen for all alternatives. For example, analysis areas consisting entirely of Wilderness would be allocated to Wilderness use in all alternatives.

Forest Service Response

The Shoshone National Forest is 57 percent wilderness. The Wyoming Wilderness Act of 1984 specifically mentions release of lands not designated as wilderness for multiple use, specifically condemns the concept of nonwilderness buffers around designated wilderness, and states that lands not designated as wilderness need not be managed to preserve wilderness character. Many of the nonwilderness areas are protected from development because of being critical for wildlife, unproductive for wood fiber production, or critical for visual corridors. Regardless of entry into a few of the many remaining roadless areas, the Forest will remain overwhelmingly unroaded and more or less undeveloped. Our charter is to manage for multiple-use, not just preservation.

The uses of the Forest other than preservation and nonmotorized recreation, such as wood fiber production, domestic livestock production, oil and gas development, developed recreation, and motorized recreation, have been provided for to the extent possible given a stewardship objective. The Forest Service feels that these more commodity-oriented uses have been provided for in balance with the noncommodity uses in the preferred alternative.

44-47 As part of analysis, a "minimum level" benchmark was made to estimate the value of goods and services that would be produced if there was no management of the Forest. This included estimating the water produced naturally on the Forest and the economic value of the water. The ability to increase this water volume through management activities is insignificant. Further, the net economic values from production of all goods and services under minimum level management was subtracted from the net economic values presented for all alternatives. This means that water production played no role in selection of management strategies in alternatives and timber harvest was not justified in terms of water production. Both of these points are discussed in Chapter IV and Appendix B of both the DEIS and EIS.

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On the Shoshone National Forest, planners first built a simplified computer model and entered 60 to 80 prescriptions for each analysis area into it. After running this model, planners eliminated all but five to ten prescriptions as inefficient. The remainder were entered into the final version of the FORPLAN model.

To meet planning requirements, one prescription which was included in the final model for each analysis area was "minimum level." The minimum level prescription allows no timber management, no grazing and no open roads. The road closures severly reduce all forms of recreation, including wildlife-oriented recreation. The main recreation left available is primitive.

As previously mentioned, most analysis areas outside of Wilderness include both roadless and roaded land within them. Prescriptions for these analysis areas generally fell into three categories:

--Full development of the analysis area for timber, grazing, and other resources;

--Use of the roaded portion of the analysis area for timber and intensive grazing management combined with protection of some-to-all of the roadless portion of the analysis area; and

--"Minimum level," including closure of all roads in the analysis area.

FORPLAN was generally not given a fourth important alternative: maintenance of some or all of the existing road network for roaded recreation and to provide access to roadless areas, with no timber management and only extensive grazing management.

This prescription might be called "custodial management," and some fine-tuning might be needed to find the levels of road maintenance needed to meet recreation demands. Without this prescription, FORPLAN is given a choice between timber and recreation, or no timber and minimal recreation.

Custodial management prescriptions may have been among the prescriptions eliminated by planners from the early FORPLAN model. The overestimated timber and grazing values may have misled planners into concluding that custodial management is inefficient. Alternatively, they may have never considered such a prescription.

This review has shown that timber management loses money on much of the Shoshone Forest. Grazing, especially intensive grazing practices, also loses money. Recreation, however, has a high value so long as capacity does not exceed use. Given revised timber and grazing values, FORPLAN would select "custodial management" for much of the Shoshone Forest.

The Range of Alternatives

The failure to include a broad range of prescriptions in the FORPLAN model results in an equally narrow range of alternatives in the EIS. For five of the six alternatives considered, the level of annual timber sales ranges from 10.4 to 12.1 million board feet — a range of only 16 percent (this and following data from table II-6 of the EIS).

48 44-48 See response to comment 44-1. All analysis areas had the requested prescription available.

49 44-49 See response to comment 44-1.

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Forest Service Response

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The level of grazing, recreation, and other outputs is similarly narrow. Cattle grazing ranges from 70,600 to 101,000 AUMs, and sheep grazing ranges from 28,200 to 41,400 AUMs. Roaded natural recreation ranges from 260,000 to 287,000 visitor days, and wildlife and fish use ranges from 288,000 to 306,000 visitor days.

In comparison, the reduced budget alternative (E) produces only 2.9 million board feet of timber, 45,400 AUMs of cattle grazing, and 15,200 AUMs of sheep grazing. Since timber and grazing tend to lose money, this alternative would probably have the highest value of these resources.

Alternative E is highly undesirable, however, since it produces so little recreation. Roaded natural recreation falls to 197,000 visitor days -- 24 percent less than any other alternative. Wildlife and fish recreation fall to 203,000 visitor days -- 30 percent less than any other alternative.

The defects in E are not related to any explicit assumption that timber and grazing are needed to produce recreation. Instead, they are due to the lack of a wide range of prescriptions. Given a limited budget, E was forced to select the minimum level prescription for many of the analysis areas. This greatly reduced recreation outputs.

Given that existing recreation capacities are so much greater than use, it is difficult to see why recreation outputs vary at all among alternatives. Alternative E could close 95 percent of existing roads and still provide more roaded recreation capacity than the projected use over the next 50 years.

It is clear that planners confused capacity with use when entering data into FORPLAN. Correcting this would require that prescriptions with smaller percentages of roaded land have higher levels of use.

However, this problem is much less serious than the lack of an alternative which produces high levels of recreation and low levels of timber and grazing. Clearly, such an alternative can be conceived, but would require prescriptions allowing maintenance of some roads for recreation without timber harvesting.

The lack of such an alternative violates the National Environmental Policy Act (NEPA). Planners should assure that this flaw will be corrected before the final Plan is prepared.

Side Benefits of Timber Management

As the analysis of timber values earlier in this report shows, today's timber prices do not justify proposed levels of timber harvest. Are there other reasons why timber management should take place on the Shoshone National Forest?

In a "white paper" on sales-below-cost published in July, 1984, and in testimony before Congress on 28 February 1985, the Forest Service has cited a number of reasons why apparent sales-below-cost are justified. These include:

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44-50 Recreation use is not a function soley of capacity. In fact, in situations where capacity greatly exceeds use, capacity is a poor indicator of what use may occur. For this reason, the condition that would be achieved for each analysis area if managed under each prescription developed for it was carefully analyzed. This analysis was in terms of the relative attractiveness of the area, outstanding landmarks and scenery, recreation facilities provided and presence of features such as bodies of water that attract users. Also factors such as the type of access provided (roads or trails) and travel distances from major roads and population centers were noted. Based on looking at all of these factors, an estimate was made of the recreation use that would probably occur if that analysis area were managed under a specific prescription. In this way, actual expected recreation use was included in analysis and valuation of this recreation in analysis was done in a meaningful way. There was no confusion between use and capacity. (See Appendix B for a more complete discussion of this procedure.) See response to comment 44-46 also.

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Forest Service Response

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--New roads provide access to future timber sales as well as current sales. The value of these future sales must be considered.
--Roads built to access timber are also used by recreationists. The recreation values justify road costs.
--Roads reduce costs of fire prevention.
--Openings created through timber management create forage for big game, providing additional recreation values.
--Timber management helps protect the forest from insects and disease.
--The jobs and income created by timber management help provide local community stability.

This report has already shown that no side benefits for recreation, wildlife, or water can be expected from timber management. Instead, these resources may suffer from timber harvests. The following sections will discuss benefits to future timber sales, fire protection, insects and disease control, and community stability.

1. Roads and Future Timber Sales

Many timber sales, especially in roadless areas, require "advanced road construction" to insure that harvest units are well dispersed over the forest. This means that the number of miles of roads constructed per acre of timber harvested is greater than the eventual average number of miles of road per forested acre.

Advanced roads can be used for later timber sales, thus reducing the cost of those sales. The Forest Service argues that the benefits from such future sales can outweigh the added costs of sales today.

This may be true in some instances, but does not appear to be true in the Shoshone -- especially in roadless areas. Figures from FORPLAN cited above indicate that timber costs will continue to exceed revenues after the road network is completed. Thus, there is no long-term benefit to building roads in the Shoshone.

2. Fire Protection

The Forest Service claims that roads ease problems of fire suppression. But fire managers face two major problems: the risk that a fire will start, and the difficulty in controlling fires once they start. The roads constructed to access timber sales reduces the difficulty in controlling fires, but not the risk that fires will take place.

Instead, timber-related roads greatly increase fire risk. Because of the debris from timber harvests, timber sale operations are a high fire risk. Additionally, if roads are left open, people using the roads may accidentally start fires.

In roadless areas, most fires are caused by lightning. Such fires are often small, especially if the lightning is accompanied by rain storms. Human-caused fires tend to be larger and more expensive to suppress, even when they are in less remote areas.

51 44-51 Because of intensive timber management over the last 25 years, most of the areas to be managed for timber already have roads in or near them. Thus "advanced roading" has already been done for these areas. Most roadless areas on the Forest that contain tentatively suitable timberland are within 2 miles of an existing road; therefore access to them will not require many miles of road. Total new road construction for the next 50 years is 230 miles of which only 80 will remain open for public use. That is an average of 4.6 miles of new road construction per year. Timber economics as discussed in response to comment 44-44 shows that timber can pay its share of the construction costs for these roads. Finally, not all of the roadless areas are going to have roads built into them and those that will will have only a portion of their area roaded in line with the philosophy of the Plan.

The Forest Plan will guide management over the next 10 to 15 years and will be revised every 15 years or sooner in response to major changes in information or needs of the American public. Projections over 50 years are provided to portray long term consequences only.

52 44-52 These comments have some merit applied on a very broad scale. However, they do not accurately reflect the situation on the Shoshone National Forest where large fires are common in wilderness and roadless areas and much less common in roaded areas. Fire records since 1965 clearly show the importance of roads in prompt fire suppression in suitable timber land in the Shoshone.

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The trade-off represented by opening an area through road construction and timber harvest must be assessed by considering the average cost of fire control in roaded and roadless areas. In most cases, road construction will lead to an overall increase in costs of fire control. Thus, the increased fire risks caused by timber sale operations, debris and people using roads usually outweigh the benefits created by improved access in case of fire.

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3. Insect and Disease Control

Several insect and disease problems are discussed on page III-71 of the draft EIS. The major insect problem is the mountain pine bark beetle, and the major disease problem is the Commandra blister rust (Cronatium comandrae). Dwarf mistletoe is also a "widespread problem in the Forest.

To prevent these pests from spreading, planners propose a "variety of silvicultural activities [which] can help prevent insect and disease problems. They include clearcutting, slash disposal, site preparation for regeneration, commercial and precommercial thinning, timber stand improvement and partial cutting."

These activities seem highly inappropriate when the benefits and costs are considered. The EIS says that the "long-term goal of the integrated pest management program is prevention rather than emergency suppression of insects and diseases," yet this goal may prove far more costly in the long-run than an occasional suppression program.

53

For example, dwarf mistletoe results in minimal tree mortality. Instead, as a parasite its main cost is a loss of stand growth. This cost is zero if trees have no value. Any efforts spent to reduce or prevent dwarf mistletoe are a complete waste of time and money when timber is submarginal as it is on most of the Shoshone.

Like mistletoe, commandra does not usually kill an entire tree, and if the attacked trees have no value, efforts to control it are wasted. Moreover, the activities proposed in the EIS are likely to be counter productive.

Like most other rusts, commandra requires an intermediate host where its spores ripen before it can attack lodgepole pine. The host for commandra is toad flax (Comandra sp.). Spores spores can travel up to two miles.

Toad flax does not grow well on shaded sites and prefers openings or forests with incomplete canopy cover. Clearcutting, thinning, and other silvicultural techniques discussed in the EIS will provide sites for more toad flax, accelerating the spread of the commandra rust.

Neither rust nor mistletoe attack trees of a particular age. Conversion of "overmature" timber to younger stands will not provide any protection against these diseases. It may, however, provide protection against bark beetle attacks, which often focus on older stands.

Successful bark beetle attacks are fatal to the tree. In many situations, beetles only attack weaker trees in the stand, thus providing a natural thinning operation. Since commercial thinning on the Shoshone will certainly lose money, such attacks should be welcomed by managers.

44-53 The Forest Plan utilizes the best currently available scientific information regarding silvicultural practices. This information contributed to the establishment of the silvicultural standards and practices listed in the Forest Plan. As additional knowledge is gained, practices can be improved.

With vast, continuous areas of heavy timber (those most susceptible to insect and disease attack), it is very difficult and expensive to attempt to control burn acres of 40 acres or less. In addition, lodgepole pine stands with nonserotinous cones, are slow to regenerate naturally following fire.

As previously noted, FORPLAN projects timber receipts of $550,000 per year. However, these should be reduced by 40 percent, to $330,000, to account for overestimated timber values.

FORPLAN also projects annual timber costs of $185,000 and road costs of $330,000 over the next 50 years. Included in these road costs are annual maintenance costs of $75,000. Maintenance of, at most, a third of the roads might be needed for recreation, so $25,000 of this might be attributed to recreation.

This means that net annual timber receipts will average at least $160,000 per year. The annual cost per job will be nearly $3,000. Using the Forest Service's 4 percent discount rate, the capital value of this cost is about $75,000. 54

Is each timber job worth $75,000? Or can more jobs created by investing this $75,000 in other resources? The Forest Service assumes that timber has no negative effects on the outfitting industry, but it at least has the effect of competing for funds in the Forest Service budget. Additional funds might make it possible for more considerably outfitter and nonoutfitter recreation at minimal cost.

In sum, timber sales do contribute to local employment, but such contributions are minimal and the costs are high. It is likely that timber management, particularly in areas currently roadless, will have a long-term detrimental effect on recreation, which produces far more jobs at a far lower cost. The Forest Plan should concentrate on recreation rather than timber.

Monitoring

This review has shown that many relationships between forest resources remains uncertain. A sound monitoring program can overcome these problems, yet monitoring is frequently the weakest part of a forest plan. The draft Shoshone monitoring program is, if anything, weaker than most.

Chapter IV of the Shoshone Plan describes which elements of the Plan should be monitored, but does not say how much monitoring will cost or what will happen if funds are unavailable. Nor does it say what will happen if monitoring finds, for example, that reforestation is unsuccessful or the effects of timber on fish are greater than anticipated. It only states that monitoring "will be documented in an annual Forest Plan Evaluation Report." 55

Instead of an "evaluation," the monitoring program needs to spell out exactly how the managers must react if a part of the Plan appears to be failing. If, for example, reforestation appears to take an average of 10 years rather than 5, timber harvest levels should be reduced to compensate.

Such "automatic feedback" was once a standard component of Forest Service timber management plans. If the budget was unavailable to do the planned number of acres of precommercial thinning, a feedback process would be "triggered" and timber harvest levels reduced.

44-55 We agree that monitoring of Plan implementation is critical and that this feedback loop needs to be provided so that management of the Forest can be adjusted as needed. Such direction is in the regulations governing land and resource management planning (36CFR219). There has recently been much effort given by the Forest Service in general to the subject of monitoring and implementation of Forest Plan. These efforts have resulted in Supplements to the Forest Service Manual. Discussion of the planning regulations has been added to Plan, Chapter IV. As stated in Plan, Chapter IV, details of monitoring are included in the documents incorporated by reference. All such documents are available for review by the public. It is just not possible to incorporate all details of monitoring into Plan, Chapter IV.

Annually, all monitoring activities and implementation of the Plan will be evaluated and appropriate measures taken if deficiencies are noted. When new information is obtained, the significance of that information as it relates to management of the Forest is evaluated. In cases such as these, response will be taken as appropriate ranging from no response, to issuing a Plan amendment, to completely revising the Plan.

The Plan is in essence a "contract with the public" stating that this is how we are going to manage the Forest for the next 10-15 years. One purpose of planning is to reduce the ability of individual civil servants to change the intent of the Plan towards their personal philosophy. It is up to the Forest Service and the public to see that the Plan is followed or changed to meet needs by appropriate processes.

Most of the money spent in monitoring is included in the "program management" for each resource. This includes keeping resource records, evaluation of standards and guidelines to determine adequacy, and carrying out the monitoring as spelled out in Plan, Chapter IV. The money listed for monitoring in Appendix J is slated for monitoring specific projects rather than for a resource program in general.

Comment 44

Forest Service Response

As previously noted, FORPLAN projects timber receipts of $550,000 per year. However, these should be reduced by 40 percent, to $330,000, to account for overestimated timber values.

FORPLAN also projects annual timber costs of $185,000 and road costs of $330,000 over the next 50 years. Included in these road costs are annual maintenance costs of $75,000. Maintenance of, at most, a third of the roads might be needed for recreation, so $25,000 of this might be attributed to recreation.

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When things do not go according to plan, an evaluation will be made as to the seriousness of the deviation. When new information is obtained, the significance of that information as it relates to management of the Forest is evaluated. In cases such as these, response will be taken as appropriate ranging from no response, to issueing a Plan amendment, to completely redoing the Plan.

The Plan is to be in essence a "contract with the public" stating that this is how we are going to manage the Forest for the next 10-15 years barring arrival of significant new information. One purpose of planning is to reduce the ability of individual civil servants to change the intent of the Plan towards their personal philosophy. It is up to the Forest Service internally and the public to see that the Plan is followed or changed to meet needs by appropriate processes.

Most of the money spent in monitoring is included in the "program management" for each resource. This includes keeping resource records, evaluation of standards and guidelines to determine adequacy, and carrying out the monitoring as spelled out in Plan, Chapter IV. The money listed for monitoring in Appendix J is slated for monitoring specific projects rather than for a resource program in general.

Comment 44

Automatic feedback should be extended to a wide variety of programs contemplated in the Forest Plan. For example, the Plan proposes a number of wildlife habitat improvement projects. If funds are not appropriated for these programs, which in part are designed to compensate for habitat destruction elsewhere on the Forest, then timber sale levels should be reduced. 55

Automatic feedback will thus provide managers with a good argument for a true multiple use budget instead of one dominated by timber. Further examples of automatic feedback which should be incorporated into the Shoshone Plan can be found in the December, 1984, issue of **Forest Planning** magazine.

Conclusions

The Shoshone Forest Plan and the alternatives considered in the EIS are based largely on a complex computer model. Unfortunately, the FORPLAN model contains several failings which greatly reduce the value of the results.

Chief among these is the lack of important alternative prescriptions. This report has shown that, in many parts of the Shoshone, the highest values are produced by recreation and wildlife, while timber and grazing produce negative values. Yet no "custodial" prescription, allowing some existing roads to remain open for recreation without accompanying timber harvests, is considered. 56

The model also has major problems with economic values. Timber, grazing, and water values are far too high. Recreation values may or may not be too high, but most of the recreation capacity of the Forest is unused and thus has no value. Correcting these values, and adding new "custodial" prescriptions, would result in very different FORPLAN runs.

Planners should make these and other changes in the FORPLAN model recommended in this report. If, as CHEC suggests, new FORPLAN runs indicate that the model is highly sensitive to these changes, then benchmarks and alternatives should be re-run. This is likely to produce a wider range of alternatives and improved information for making the final decision.

Forest Service Response

44-56 Refer to responses 44-1, 44-44, 44-45, 44-47 and 44-50. The desired "custodial" prescription was included in the original model used in analysis and remained in the model used for analysis of the Final Plan as discussed. The timber values were examined and no justification for changing them was identified. Range values were examined and the commenter overstated range management costs; the situation is not as portrayed in this comment. Water values in the original and final analysis were netted out so that they had no effect on solutions. And rather than dealing with hypothetical capacity figures for the Forest both the original and final analysis models used estimates of actual use so that recreation was adaquately and realistically included in analysis. Further design of prescriptions emphasized production of high quality recreation and such prescriptions were selected in the Plan. In response to all comments received, all alternatives were rerun using FORPLAN as displayed in this document.

Comment 45

RECEIVED SEP 2 6 1985

Proj. No.

TO: Forest Service Director, Shoshoni National Forest

Re. 50 Year Plan

DATE: 9/19/85

TO WHOM IT MAY CONCERN:

I'm writing this to give my imput into your 50 year plan that's being prepared for the Shoshoni National Forest. I have several ideas that I feel should be included in that plan.

1. First, I hope the recreational aspects of forest use are given prominant attention. By this I mean wildlife and scenery, to be used by tourist, photographer, hunter, birdwatcher, and fisherman, etc. While I don't consider myself a rabid environmentalist, I feel Wyoming's scenery and wildlife are national treasures to be preserved for future generations. I certainly don't feel that there isn't any place for the logging industry, but I am strongly against the idea that national forests are primarily tree farms.

2. In conjunction with the above ideas, I believe that the Forest Service should include habitat improvement projects for the major wildlife species of the area. (This would help many other species as well.) Lumbering can improve habitat but "cadillac" roads that often accompany them do not. Our game herds need consideration in your plan. Especially, those species such as elk, grizzley bear, and big horn sheep who are rather intolerant of man's intrusions. So, go ahead and lumber, but keep it away from critical habitat and close off roads in order to compensate for the new ones that may be built.

3. I would also hope that there is a mechanism for change within the plan. I would not want than once the plan becomes operational everything is locked into place no matter what the outcome is. If something goes wrong or isn't working, then there must be someway to change the plan and remedy the situation. 1

4. Finally, that if there is such a mechanism for change, then I also hope the Forest Service will continue to listen to and receive input from the public.

Respectfully submitted:

Harold E. Schultz
1502 E. Lincoln
Riverton, Wyoming 82501

Forest Service Response

45-1 We agree that monitoring of Plan implementation is critical and that this feedback loop needs to be provided so that management of the Forest can be adjusted as needed. Such direction is in the regulations governing land and resource management planning (36CFR219). There has recently been much effort given by the Forest Service in general to the subject of monitoring and implementation of Forest Plan. These efforts have resulted in Supplements to the Forest Service Manual. Discussion of the planning regulations has been added to Plan, Chapter IV. As stated in Plan, Chapter IV, details of monitoring are included in the documents incorporated by reference. All such documents are available for review by the public. It is just not possible to incorporate all details of monitoring into Plan, Chapter IV.

Annually, all monitoring activities and implementation of the Plan will be evaluated and appropriate measures taken if deficiencies are noted. When new information is obtained, the significance of that information as it relates to management of the Forest is evaluated. In cases such as these, response will be taken as appropriate ranging from no response, to issuing a Plan amendment, to completely revising the Plan.

The Plan is in essence a "contract with the public" stating that this is how we are going to manage the Forest for the next 10-15 years. One purpose of planning is to reduce the ability of individual civil servants to change the intent of the Plan towards their personal philosophy. It is up to the Forest Service and the public to see that the Plan is followed or changed to meet needs by appropriate processes.

Most of the money spent in monitoring is included in the "program management" for each resource. This includes keeping resource records, evaluation of standards and guidelines to determine adequacy, and carrying out the monitoring as spelled out in Plan, Chapter IV. The money listed for monitoring in Appendix J is slated for monitoring specific projects rather than for a resource program in general.

Comment 46

RE... 9/25/85

FPD

Dear Forest Planners- 46 - W - L - C

Proj. No. Orig Type Affil

The purpose of this missive is to comment on the proposed Shoshone National Forest plan.

I would like you to be encouraged to follow a program which will give emphasis to the preservation of the Shoshone Forest in a manner that is as natural as possible.

The land here recovers so slowly that anything that scars it should be absolutely minimized. Roads, test wells, and such could be eliminated from planned use and result in greater benefit to everyone by maintaining the forest as part of a natural system. 1

There is so little wildland of this sort left. Surely it constitutes a greater resource as it is. If we haven't found the timber, oil, minerals, and other things

Forest Service Response

46-1 Environmental analysis and project planning for all such activities takes into account the recuperative powers of land types, soil, and vegetation that are potentially affected. Where regeneration of vegetation or adequate erosion control is not possible, proposed activities will not take place.

we need in the 95+% of the U.S. that is fully open to exploitation, why do we think it can be found in the last remaining pristine (or semi-pristine) areas?

Please make decisions in favor of (1) the wildlife populations and (2) preventing the land from any sort of encroachment which might threaten its natural character. 1

Sincerely,

Gene Bath
Box 515
Yellowstone Nat'l Park, WY
82190
307 344-7497

FPD-46-W-L-C
Proj. No. Orig Type Affil

Comment 47

RECEIVED ... 2 6 1985

FPD - 47 - P - L - C
Proj. No. Orig Type Ltr#

P.O. Box 185
Wapiti, Wyoming 82450
Wednesday 25 September 1985

Mr. Stephen P, Mealey, Forest Supervisor
Shoshone National Forest
P.O. Box 2140
225 West Yellowstone Highway
Cody, Wyoming 82414

Dear Steve,

Herein are our thoughts and gut feelings concerning the draft Shoshone National Forest Plan recently released.

We STRONGLY object to nearly one million acres of forest being open to oil and gas leasing. We have written so many letters on this subject, we do not feel the need to reiterate our reasons. | 1

Each year, we see fewer and fewer elk on the North Fork, and we feel your proposed plan will further reduce their numbers through timber harvesting, road building, etc. The wildlife in this valley has less and less WILDERNESS in which to live. | 2

We ask that you designate the following areas as 3B: those areas around the Beartooth, Washakie, Fitzpatrick, Popo Agie and North Absaroka Wildernesses and those areas contiguous to Yellowstone National Park: | 3

We would like to see the corridor to the East Entrance to Yellowstone Park remain as near to wilderness as possible. We would like the impossible -- NO further leasing of Everyone's land for oil and gas exploration. | 4

Thank you for listening to what we hope will be voices crying in the WILDERNESS.

Yours truly,

Stew and Mimi McMillen

P.S. Needless to say, we are against the sending Class applications on the Shoshone, especially those in areas #1 & #2. We're concerned about habitat for all the wildlife, and we would like to see the visual quality of the North Fork remain as is (or better!)

Forest Service Response

47-1 The General Mining Laws guide what can or cannot be withdrawn from mineral entry and under what conditions. We direct your attention specifically to Plan, Chapter III in the blue pages under Mining Law Compliance and Administration (General Direction 1C and 2) and Minerals Management Oil and Gas and Geothermal (General Direction 1). All direction found under Minerals Management, supplemented by Plan Appendix K, is intended to protect existing and proposed uses of the land for other resources thereby avoiding the need for withdrawal. If exceptional situations arise, or existing direction is shown to be insufficient, the option of withdrawal remains.

Mineral operations are by law, a viable use of public land. Our charter, provided by Congressional action, is to manage first according to law, and not strictly according to variable market pressures. The mining laws stipulate that lease applications can be made and must be considered for lands not withdrawn. The Forest Plan was selected in large part because it allows mineral activities while recognizing and maintaining the values of clean water, stable wildlife populations, and recreation opportunities which are of primary importance to many Forest users. The Forest Plan affords adequate protection of popular recreation areas, critical wildlife habitat, and other such resource values through application of stipulations and recommended operating procedures. Protection may be in the form of seasonal restrictions or no-surface-occupancy stipulations (see Appendix K of the Plan).

One consideration here is that a lease may never result in actual drilling activity; historically, a low percentage of leases are explored or developed, due in part to market fluctuations and uncertainties.

47-2 Wyoming Wilderness Act of 1984 added additional Wilderness to the Shoshone including the South Fork. The herd is increasing in the North Fork. Increased human habitation on private land has resulted in elk sightings in the North Fork decreasing.

47-3 See response to comment 44-46.

47-4 The North Fork corridor is managed under a roaded natural management prescription. Long range plans are not to change the existing character of the North Fork. A wilderness management emphasis would not permit the existing uses of 500,000 visitors, 12 lodges, 12 campgrounds, Wapiti Ranger Station, 68 summer homes, and Buffalo Bill Boy Scout Camp.

Comment 48

Forest Service Response

FPD - 48 - 0 - L - B
Proj. No. Orig Type Area

Texaco USA
PO Box 2100
Denver CO 80201
4601 DTC Boulevard
Denver CO 80237

September 23, 1985

U. S. Forest Service
Shoshone National Forest
Wyoming

Mr. Stephen P. Mealey, Forest Supervisor
Shoshone National Forest
P. O. Box 2140
Cody, Wyoming 82144

Dear Mr. Mealey:

We have reviewed your forest planning documents, including the DEIS, and wish to make the following comments.

1 It is not certain whether or not there has been sufficient analysis between subsurface and surface resources. The DEIS discusses the tradeoffs; however, it is questionable that this analysis meets the requirements of the National Forest Management Act regulations. The information on mineral resources was used to determine how and where the oil industry should be constrained rather than used in a tradeoff analysis.

48-1 See response to comment 68-5.

2 It is obvious that the planning documents heavily relied on the local input of special interest groups rather than on the processes prescribed by the National Environmental Policy Act. The issues raised should have been reviewed on a national level as well as on a local level. As a result of this defect, the oil industry has been foreclosed from approximately 85% of the lands under consideration. It is believed that the tradeoffs have not been properly weighed.

48-2 See response to comment 68-1 and 68-5.

3 The bias against the oil industry has been carried forward into the Grizzly Bear Situation 1 Habitat, where a no-lease policy is being adopted. On the other hand, the Forest Service feels that recreation, grazing and timber clearcuts and thinning represent no threat to the grizzly population.

48-3 See response to comment 68-8.

4 Another concern involves roads. There is no detail as to where roads will be allowed on the forest. Helicopter mobilization for

48-4 See response to comment 68-6.

Comment 48

FPD - 48 - 0 - L - 13
Proj. No. Orig Type Activ

drilling operations is impractical many times. Less restrictive alternatives must be considered before stipulations requiring use of helicopters can be upheld. 4

Texaco is unable to support Alternative D. The Shoshone National Forest, generally speaking, is a highly prospective area for oil and gas, and a reasonable forest plan could have been devised to allow exploration to proceed in a manner having no detrimental long-term effects on the lands. The Forest Plan should be rewritten to meet these requirements.

Very truly yours,

TEXACO INC.

G. M. Barrow

GMB:JE

Comment 49

Forest Service Response

RECEIVED SEP 2 7 1985

FPD-49-F-1-E
Proj. No. Orig Typo Affil

Whiskey Mtn. Technical Committee
260 Buena Vista
Lander, WY 82520

September 26, 1985

Mr. Stephen P. Mealey
Forest Supervisor
Shoshone National Forest
P.O. Box 2140
Cody, WY 82414

Dear Mr. Mealey:

It has been brought to the attention of the Whiskey Mountain Technical Committee that the 8E prescription for the Whiskey Mountain area (Glacier Addition to the Fitzpatrick Wilderness) will not provide for habitat management for the bighorn sheep. The Committee strongly objects to this exclusion based on the intent and letter of the Wyoming Wilderness Act of 1984, Section 201 (a) (11) which states: (emphasis added)

> "--- Provided that within the area referred to in this subparagraph, occassional motorized access for administrative purposes and related activities as determined by the Secretary for habitat management, trapping, transplanting of the area's bighorn sheep population may be allowed."

To separate population management from habitat management is absurd and would abrogate the cooperative Whiskey Mountain Bighorn Sheep Comprehensive Management Plan. The Committee is on record as favoring the wilderness designation only if management of the bighorn sheep is allowed to continue unimpaired by wilderness designation. One of the major migration routes is being invaded by conifers and if not treated by prescribed burning will result in a large segment of the sheep population remaining in the winter range causing a severe reduction in the wintering carrying capacity for the sheep. Numerous examples described in the Comprehensive Plan deal with maintenance and enhancement of the population and habitat. Management activities such as baiting, burning, fertilization, etc., must be allowed to continue in order to achieve the objective of "featuring the Whiskey Mountain area to perpetuate and emphasize bighorn sheep and their habitat."

The Whiskey Mountain Technical Committee therefore requests that the Shoshone National Forest Plan remove the restrictions imposed and be in accord with the Wyoming Wilderness Act of 1984 and the jointly approved Whiskey Mountain Bighorn Sheep Comprehensive Management Plan (updated 5/30/83).

Sincerely,

for John L. Sanders

Whiskey Mountain Technical Committee
- Marvin Hockley, Chairman, Wyoming Game & Fish Department
- Kay Bowles, Wyoming Game & Gish Department
- Jack Welsh, Bureau of Land Management
- Gary Butler, Wyoming Game & Fish Department
- Jack Sanders, U.S. Forest Service

1

49-1 We concur. See Management Area 8E in the Forest Plan.

Comment 50

RECEIVED SEP 27 1985

FPD-50-F-L-C
Proj. No. [illegible] Affil

Sept. 23, 1985

Steve Mealy
Forest Service Supervisor
Shoshone Nat'l Forest
P.O. Box 2140
Cody, Wyo. 82414

Dear Mr. Mealy,

I am writing to you concerning the Shoshone Forest Plan. I have been a Dubois resident for over 15 years & plan to be here a lot longer, as long as I can support the privilege.

I believe the forest service needs to manage the forest to the best use of the land & waters. To use these resources we need roads built & maintained, allowing logging and oil exploration. Many of our tree stands are at this time overmature, they need to be harvested and put to a good use rather than waste them. A new forest could be an ongoing ever growing process with good mangement. At the same time keep our Wyo. work force strong and not send more & more people to the unemployment lines. Please consider that people are more important than animals, it seems too many folks do not give this a thought. I'm that full I dont have to worry about saber tooth tigers or any of the other extinct creatures.

I realize my letter will be in the minority on this subject, but many of us are too tired at the end of the day at work & still have much to do before our job starts again the next morning. It seems the special interest groups usually have nothing better to do than to write letters, get in papers & on T.V.

Please consider the working class people in Wyoming. Lets build roads, harvest trees & explore our resources.

Sincerely, Barbara Merry
Dubois Wyo

P.S. The enclosed article expresses my sentiments, thought you might be interested

1

Forest Service Response

50-1 Timber Harvest levels in the Forest Plan have been established according to economic viability, and timber type and condition. Harvest levels in the final Plan remain approximately the same as in the proposed Plan, and are slightly higher than levels of the last ten years.

Comment 51

Forest Service Response

RECEIVED SEP 2 7 1985

EPD 51 W L B
Proj. No. Orig Type

Barry M. Wohl, M.D.
631 South Jefferson
Sheridan, Wyoming 82801
(307) 672-7000
September, 25, 1985

Supervisor Stephen P. Mealey
Shoshone National Forest
P.O. Box 2140
Cody, Wyoming 82414

Dear Supervisor Mealey:

I am writing to comment on the Shoshone National Forest Management Plan. I am a physician practicing pediatrics in Sheridan, Wyoming since 1978. My family and I moved to Wyoming in 1978 because of the wilderness experiences available in the National Forests and National Parks in Wyoming.

I am aware of the Forest Service's legislative requirement to manage the forests for multiple uses. However, I believe that the Shoshone National Forest, as part of the greater Yellowstone ecosystem, ought to be managed to preserve wildlife and scenery as the highest priority. The second priority should be to facilitate personal, non-motorized use of the forest including hiking, wilderness camping, backcountry cross-country skiing, canoeing and kayaking, rock climbing, loafing, wandering, and adventuring. The third priority ought to be pack animal aided wilderness experiences including horseback riding and pack camping. This is most important for the physically impaired. The fourth priority ought to be internal combustion assisted "recreational" uses including snowmobile and four wheel drive exploring. Motor vehicles crowd out all other recreational uses because a person on a motor vehicle uses more miles per hour of space and otherwise, and spreads ugly sounds and fumes. In addition, motor vehicle use increases the risk of catastrophy by placing the wilderness user more dependent on the mechanical device. The fifth priority should be management for hunting and fishing. The sixth priority should be management for timber harvest. The seventh priority should be management for watershed values. The eighth and last priority should be management for devasation by mineral and gas exploration and extraction. 1

The greater Yellowstone ecosystem including the Shoshone National Forest is the best remaining wilderness in the forty-eight contiguous states. Each degredation of that wilderness robs all future generations of insight to man's role as part of the Earth's living system.

Please note that my recommended priorities do not put human use of the wilderness first. When management to preserve wildlife and scenery conflicts with my use as a backpacker and winter wilderness camper, then I believe that I should be excluded for the preservation of critical habitat or vistas.

51-1 See response to comment 44-46.

Comment 51

FPD-51-W-L-B

Letter to Supervisor Healey, September 25, 1985. Page 2

Please be sure that the final plan addresses the cumulative impacts the proposed activities will have on the greater Yellowstone ecosystem. Please limit timber harvest consistent with financial necessity. Please avoid timber harvest in roadless areas. Please minimize all road construction. Please eliminate oil and gas leasing from the Washakie, North Absaroka, and Absaroka-Beartooth wilderness areas. 4 5 3

Please manage the Clark Fork River to maintain its eligibility for wild and scenic river status. Please withdraw all wilderness and critical grizzly bear habitat from oil and gas development. 6

Please eliminate timber sales and all other uses of the forest which might conflict with the grizzly bear from critial grizzly bear habitat. We need to give the grizzly bear of Yellowstone room to survive. Respect for his habitat and needs is crucial for us to develop a greater understanding of our human role in the wilderness and the rest of the Earth. Conflicts between critical grizzly bear habitat and any other use including backpacking or wilderness skiing. 7

Please eliminate roads into roadless areas. 5

Please consider reintroduction of a viable wolf colony into the ecosystem. 8

Please eliminate roads into Deep Lake, Dunoir Valley, Sawmill Creek, north of Sinks Canyon, lands surrounding Worthen Meadows, Fiddlers Lake to Christina Lake, and areas surrounding wilderness areas and Yellowstone National Park. 9

Please add alternatives which do not assume benefits to wildlife and recreation from increased roads and timber harvest. In my experience, inmproved motor vehicle access for backpackers, hikers, and skiiers actually increases usage but degrades wilderness experiences. I would rather have to park farther from my destination, hike farther in, see fewer people, and have fewer opportunities to use the wilderness than to share the wilderness and my forever memories of my trips with too many people. 10

I do not believe that economic justification is necessary for the National Forest Service to implement my priorities. The best use of the forest is to promote reverence for the Earth and our role in it, irrespective of short term economic benefits. I am sure that you, as foresters, are more concerned with the health of the forest than with short term economic benefits.

Please keep me informed of developments in the plan. Please send me drafts and maps of the plan as they become available.

Sincerely yours,

Barry M. Wohl, M.D.

Forest Service Response

51-3 Oil and gas leasing is prohibited in legislated wilderness areas, per the Wilderness Act of 1964 as amended.

51-4 See response to comment 24-1.

51-5 In the 1984 Wyoming Wilderness Act, Congress directed that nonselected roadless areas be released for multiple use purposes, and that "buffer areas" were not to be considered adjacent to Wilderness. With this legal direction in mind, some timber sales and the accompanying roads have been scheduled in roadless areas, while other currently roadless areas have not been scheduled. See also rsponse to comments 182-5 and 44-46.

51-6 See response to comments 68-8 and 13-1.

51-7 We're following Greater Yellowstone Grizzly Bear Guidelines (GYCBG) for activities in Situation 1 and 2 and all projects will have Consultation with the Fish and Wildlife Service for clearance and mitigating measures.

51-8 See Biological Assessment, Appendix H of EIS.

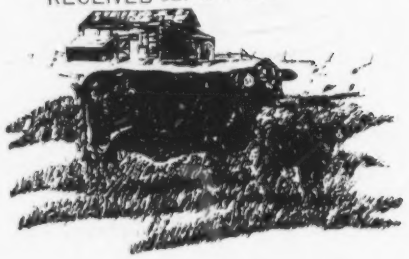
51-9 See response to comment 51-5.

51-10 See response to comment 44-1, 44-46, and 182-5.

Comment 52

Forest Service Response

RECEIVED SEP 2 7 1985



FPD - 52 - P - L - B
Proj. No. Orig Type Affil

WINANTS RANCH
3638 SOUTHFORK RD.
CODY, WYO. 82414

SEPT. 25, 1985

MR. STEVE MEALY
FOREST SUPERVISOR
WAPITI DISTRICT
P.O. BOX 2140
CODY, WYO. 82414

IN RE: FIFTY-YEAR PLAN

DEAR STEVE,

ON BEHALF OF THE WINANTS RANCH, I FEEL I SHOULD WRITE A COMMENT OF PROTEST TO PART OF THE FOREST SERVICE FIFTY-YEAR PLAN. THIS PERTAINS TO IT'S GRAZING LEASE POLICY MAINLY CONCERNING THE LEGG CREEK, HAWKEYE RANCH, AND DRAPER RANCH ALLOTMENTS. IF THE OTHER PARTIES ARE NOT CONCERNED I AM.

I DO NOT FEEL THAT THE SHUT DOWN OR CLOSING OF THESE ALLOTMENTS FOR BIGHORN SHEEP HABITAT IS THE RIGHT THING TO DO. I FEEL THAT FOR MANY YEARS THE CATTLE AND SHEEP IN THIS AREA HAVE DONE WELL TOGETHER. UNLESS THE FOREST SERVICE PLANS ON RAISING A STUPENDOUS SIZE SHEEP HERD, I FEEL THERE IS NO NEED TO CUT THESE ALLOTMENTS FOR THE FOLLOWING REASONS:

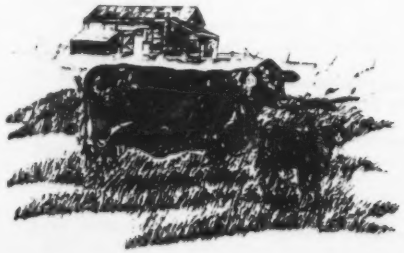
NUMBER ONE BEING, AND I BELIEVE GAME AND FISH RECORDS WILL AGREE WITH ME, THAT OVER THE LAST FIFTY YEARS OR MORE, THE SHEEP, ELK AND DEER HERDS HAVE BEEN ON THE INCREASE, AND CATTLE HAVE BEEN ALLOWED TO GRAZE OVER THIS PERIOD.

NUMBER TWO, THAT IN THIS AREA, THE LEGG CREEK PERMIT IN PARTICULAR, THERE ARE FEW PLACES WHERE SHEEP AND CATTLE GRAZING EVEN OVERLAP AND THESE AREAS ONLY BEING SEVERAL HUNDRED YARDS. ALONG WITH THAT, MOST OF THIS PERMIT IS NOT "A" TYPICAL SHEEP HABITAT. SHEEP, BY MY OBSERVATION, PREFER ROUGH TERRAIN FOR SAFETY REASONS AND THIS TERRAIN COWS SHUN. SHEEP ARE DRIVEN TO LOWLAND GRAZING BY HARSH WINTERS OF THIRTY BELOW ZERO WHICH, I WOULD IMAGINE, IS TO CONSUME MORE FEED TO MAINTAIN LIFE AND BODY HEAT. MY

1

52-1 Prior to any reduction in stocking, range reanalysis will occur, the State Game and Fish will be asked to jointly ride the allotment with Forest Service and permittee, and numbers will be established based on discussion of parties involved.

Comment 52



EPD - 52 - P - L - B
Proj No Orig Tract Affil

OBSERVATION HAS BEEN THEY FIND THE FEED THEY NEED BECAUSE OF GOOD MANAGEMENT BY THE FOREST SERVICE AND PERMITEES.

THESE LEASES ARE OF GREAT VALUE TO THESE RANCHES AND WE HAVE TRIED TO COOPERATE WITH FOREST SERVICE REGULATIONS IN ANY WAY. WHAT ABOUT REINBURSEMENT IN SOME WAY FOR LOSS? DOES THIS MEAN YOU WILL ALLOW MORE COWS IN OTHER LEASES OR NEW LEASES? WHY WOULD GRAZING LEASES BE CUT IN THIS AREA FOR CRITICAL SHEEP HABITAT AND OIL AND GAS EXPLORATION CONTINUE? SURELY YOU DON'T EXPECT US TO BELIEVE THIS PRACTICE IS IN THE SHEEP OR WILDLIFE INTEREST. 1

I DON'T FEEL AFTER TALKING TO SHEEP RESEARCH PEOPLE THAT THEY FEEL THIS APPROACH TO BE RIGHT NOR DO I FEEL THE GAME AND FISH APPROVES OF THIS CUT OF GRAZING RIGHTS. IF THIS RANCH WOULD BE ASKED TO KEEP OUR CATTLE OFF, THE WE MAY ASK THE FOREST SERVICE TO KEEP THEIR LIVESTOCK OFF OUR LAND.

I FEEL THIS APPROACH OF CUTTING THESE LEASES IS THE WRONG THING TO DO. I FEEL IT HAS TO BE A SINGLE SPECIES MANAGEMENT PRACTICE BECAUSE THIS WILL NOT BENEFIT ELK AND DEER THAT MUCH IN OUR ALLOTMENT, OR THE OTHER PERMITS EITHER.

I HOPE THIS PLAN HAS BEEN RESEARCHED THOROUGHLY, BUT I FEEL IT HAS NOT.

SINCERELY,

Rick McNeil

RICK MCNEIL
WINANTS RANCH, MANAGER

cc: MR. JIM ROWLAND
MR. BILL CERING
MR. OLIVER STEADMAN

Comment 53

Forest Service Response

RECEIVED SEP 2 7 1985

FPD - 53 - P - L - C
Proj. No. Orig Type Affil

U.S. Forest Service
Mr. Steve Healy Supervisor
Cody, Wyo;

Sir,

In accordance with the 30 year plan proposed for the Shoshone National Forest

We believe in multiple use. If the Forest Services would consider listening to permittee occasionally. There small rangeland areas, the environmentist cry about would not be over grazed. Some drift fences maybe a help, many of them cause close quarters for wildlife as well as live stock, which in turn causes the development needs - The poor environmentist misuse if one wish to spray the weed and reseed with grasses - that are appealing to wildlife and livestock. If wildlife didnt like ranchers pasture, they sure wouldnt be in the area during the summer or winter months.

Neither am I in favor of these giant groups, lobbying legislation that causes the raise of our fees, threaten riparian water rights or allowing these groups to participate in deciding the suitability & allotments for grazing.

1 53-1 On some areas of the Forest when a conflict arises between wildlife and commodity production, wildlife will be favored. On other areas, the commodity production will be favored. The overall objective is to maintain habitat sufficient to support Wyoming Game and Fish herd unit objectives.

Comment 53

Forest Service Response

FPD- 53- P- L- C
Proj. No. Orig Type Affil

Timber clear cutting aeras such as Reef Creek & Sulpher creek, allow nothing but the return of weeds and erosion - The company who has such a contract should be held responsiable for the reseeding of these aeras to patable grases.

The F.S. uses tax money to build these special roads for timbering concerns, later destroy them after Timber Harvest is over another waste of Tax dollars.

Mr Mott desires a buffer zone around Yellowstone Park for the grizzles, thats only his begining, does he prefer grizzly chops to Reef Steak?

According to Yellowstone Park litature the decesion to close 725,000 acres to public use, was made by few Wildlife biologist and US Fish and Wildlife Service groups. I do not feel such monumental decesions should rest with a few reasearchers - whos major objective is not the protection of Wildlife and their habitate, but the preservation of their grants for their self promoted jobs.

We also have a problem with grasshoppers, crickets and mosquitoes - Agriculture sicu...

2 53-2 The cost of road construction, reconstruction, and obliteration is paid for by the timber purchaser and not by taxpayers dollars as suggested. The base purchase price of the timber includes allowances for road construction, etc. and the successful bidder must bear the cost of these activities.

Comment 53

FPD - 53 - P - L - C
Proj. No. Orig Type Affil

3

has talked of this situation for years yet our T.S. Range managers and wildlife groups turn a deaf ear They merely want to make more land Grabs.

Thank you -

Evelyn B. Martin

Evelyn B Martin
540 Rd 2ABN
Cody Wyo
82414

Comment 54

Forest Service Response

RECEIVED SEP 2 7 1985

FPD - 54 - E - L - E
Proj. No. Orig Type Affil

Lander Area Chamber of Commerce

160 North First Street Lander, Wyoming 82520 307-332-3892

26 September 1985

Steve Maley
Forest Supervisor
Shoshone National Forest
PO Box 2140
Cody, Wyoming 82414

Dear Mr. Maley:

This letter is in regard to the proposed ten year forest plan on the Shoshone National Forest. The plan in it's present form calls for approximately 260 MB ft. of sales in the Lander area per year. Your own staff in Lander's District office, proposed a sales program of approximately 1000 MB ft. per year over the next ten years. This expanded program would create additional jobs for the Lander area.

An expanded program would also help clean up many stands of timber that are predominantly dead and dying from the mountain pine beetle infestation. Because of the hign recreation use of the area these dead stands could be a significant fire hazard to the public.

Due to the depressed economic conditions in the Lander area and the poor conditions of the timber stands in the South Pass area we would support an expanded timber sale program in the Lander District of the Shoshone National Forest.

Kind Regards,

LANDER CHAMBER OF COMMERCE

Russ Fuhr
President

Linda Van Fleet
Manager

1

54-1 Based on public comment, and the need to manage timber stands on the Lander District, the Plan will be changed to reflect a harvest if one million board feet of timber. This will consist of 50% dead and 50% live. See also response to comment 80-2.

Home of: Pioneer Days Apple Festival Wyoming State Winter Fair One Shot Antelope Hunt

Comment 55

RECEIVED SEP 2 7 1985

champlin

FPD-55-0-L-B
Proj. No. Orig Type

September 25, 1985

Mr. Stephen P. Mealey
Forest Supervisor
Shoshone National Forest
P. O. Box 2140
Cody, Wyoming 82144

Re: Shoshone National Forest Land Resource Management Plan and Draft Environmental Impact Statement

Dear Mr. Mealey:

Champlin Petroleum Company, a subsidiary of Union Pacific Corporation, thanks you for the opportunity to comment on the captioned Plan and E.I.S. They are among the most comprehensive we have seen; however, we are concerned with the lack of consideration given oil and gas.

We are somewhat surprised that decisions have apparently been made and management direction apparently formulated as a result of an anticipation of public reaction on the part of local special interest groups. It seems to us that the charge of the Planning Process is to address all issues and concerns of both local and national interests. Oil and gas exploration and development is a valid use of lands covered by the Plan; however, the Plan seems to be totally negative toward oil and gas. This is discouraging since much of the lands are rated high in oil and gas potential. 1

We are especially concerned about the lack of lands available for leasing and those lands recommended for leasing, but with no surface occupancy. The Errata Sheet states that 934,990 acres are available for leasing, but when those lands with no surface occupancy stipulations are deleted, this leaves only approximately 385,990 acres or 15.86% of the total forest lands available for leasing with surface occupancy. Included in those lands with no surface occupancy or a recommendation for no leasing are the Situation 1 Grizzly Bear Habitat Lands. This is another discrimination against oil and gas leasing on the part of the Forest. There are existing oil and gas leases on Situation 1 Lands in other forests, and industry has of course conformed to the Guidelines for Management Involving Grizzly Bears in the Yellowstone Ecosystem adopted in 1980. In any event, to make such a recommendation for no leasing is to withdraw those lands without proper authority. We feel there is ample protection of the grizzly bear under the above guidelines and the Endangered Species Act. 2 3

Forest Service Response

55-1 See response to comment 68-5

55-2 See response to comment 68-5.

55-3 The decision to recommend lease denial in Situation I is supported by two environmental analysis documents. In both cases, there were no public comments on these documents which opposed this decision. These documents are the DEIS for Oil and Gas Exploration and Leasing within the Washakie Wilderness and the 1982 Environmental Assessment of Oil and Gas Operations in Grizzly Bear Situation I and II. Further, the decision was supported by the U.S. Fish and Wildlife Service in their formal opinions written for these documents. The U.S. Fish and Wildlife Service recently issued a "no jeopardy opinion" on the Forest Plan. This opinion was partially based on lease denial on Situation I lands.

The decision in the Plan does not constitute a withdrawal for it is a temporary ban on leasing. If Situation I lands were withdrawn, leasing following recovery of the bear would require negation of the withdrawal.

The Plan selected the option of requiring no-lease as opposed to withdrawal because in the event of a recovered grizzly bear population, leasing would again be considered. Further, the cumulative effects studies currently underway might help us understand ways in which oil and gas activities may be accomplished with no effect on the Grizzly. Once the cumulative effects can be predicted, then the Interagency Coordinator Committee could consider the general opening of Grizzly Situations I to leasing and formally consult with U.S. Fish and Wildlife Service.

Comment 55

FPD-55-0-L-B
Proj. No. Orig Type Ass

Mr. Stephen P. Mealey
September 23, 1985
Page 2

With respect to the concept of helicopter mobilization for isolated tracts where oil and gas leasing may occur, we feel this is totally unreasonable. This is a concept that has not been adequately tested and is not economically feasible at the present time. Although one company has agreed to use helicopter mobilization, it is our understanding that the costs of doing so were not prohibitive in that particular case. We believe that the attempt to impose such an extreme restriction on non-roaded lands outside the wilderness is unjustifiable and that conventional access by road construction is far more acceptable. Industry has proven that such access methods can be reclaimed with no long-term effects. Although this proposed restriction is not an outright withdrawal, the end result would be the same. 4

In summation, we find it discouraging that oil and gas is not given equal consideration with other forest uses. The impression is given that if it is allowed at all, it will be so restricted and subservient to other uses that it seems the Forest is attempting to discourage all such activities. 5

Very truly yours,

James M. Taylor

James M. Taylor
Staff Landman - Public Lands

JMT/mrk

Forest Service Response

55-4 Isolated occupancy tracks are areas on the Forest where the soil and landform conditions can withstand normal oil and gas operations without exceeding minimum standards of soil and water resources, but which appear to be inaccessible. They are, in effect, islands where there is no reason torestrict surface occupancy on that particular area, but where there does not appear to be a way to construct a road to that area and still protect soil and water resources. If an area that is suitable for surface occupancy lies adjacent to other such areas and together they form a corridor to an existing road, then it was not considered an isolated tract. This is true even if there is no road in that corridor presently and regardless of the number of miles of new road construction necessary to connect that area to an existing road. In short, isolated tracks are areas where building a road to them using standard technology would violate soil and water minimums. If a road can be built to it, it is not "isolated".

The Errata Sheet to Appendix K of the Proposed Plan (which has been incorporated into Appendix K of the Forest Plan) describes how site specific environmental analysis fits into the leasing, exploration, development process. The process outlined calls for a site-specific examination of NSO areas to see if, in the context of a specific proposal, they are truly isolated. This process will be used to minimize any "lost opportunity to discover" by looking at ways to explore or develop without violating other resource standards. The discussion on isolated tracts in Appendix K has been modified to increase clarity.

The concern over isolated tracts has caused a wave of "helicopter paranoia". If after a site-specific analysis, the area is truly isolated, then helicopter access is presently the only means to access. Even the helicopter's tremendous expense, it may very well be cheaper than conventional road construction and subsequent obliteration provided that a road could be constructed without violating soil and water standards. In fact, Willie Legg of Marathon Oil, indicated that the helicopter show on the North Fork may have been cheaper than roading from an exploration standpoint. The fact that there are presently few rigs available that can be mobilized by helicopter would indicate that the current cost may be artifically high. If a demand is demonstrated additional supplies of these portable rigs will probably bring the cost down.

Individual management area prescriptions contain standards and guidelines dealing with transportation systems.

55-5 See response to comment 68-5.

Comment 56

Forest Service Response

RECEIVED SEP 2 7 1985

P.O. Box 836
Ft Washakie, Wyoming 82514
September 20, 1985

FPD - 56 - F - L - C
Proj. No. Orig Type Affil

VI-165

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56-1

The Shoshone National Forest is 57 percent wilderness. The Wyoming Wilderness Act of 1984 specifically mentions release of lands not designated as wilderness for multiple use, specifically condemns the concept of nonwilderness buffers around designated wilderness, and states that lands not designated as wilderness need not be managed to preserve wilderness character. Many of the nonwilderness areas are protected from development because of being critical for wildlife, unproductive for wood fiber production, or critical for visual corridors. Regardless of entry into a few of the many remaining roadless areas, the Forest will remain overwhelmingly unroaded and more or less undeveloped. Our charter is to manage for multiple-use, not just preservation.

The uses of the Forest other than preservation and nonmotorized recreation, such as wood fiber production, domestic livestock production, oil and gas development, developed recreation, and motorized recreation, have been provided for to the extent possible given a stewardship objective. The Forest Service feels that these more commodity-oriented uses have been provided for in balance with the noncommodity uses in the preferred alternative.

Based on all analysis, the Forest Service believes that Alternative D presents a more balanced mix of Forest uses than Alternative C. Alternative D as a whole responds better to the issues and concerns identified.

Comment 57

RECEIVED SEP 2 7 1985 FPD-57-F-1-C
Proj. No. Orig Typo Affil

Mr. Mealey:

I am enclosing a portion of a letter I recently received from the Greater Yellowstone Coalition. I have circled the points I consider important. I consider the idea that roads and timber sales might be beneficial to wildlife to be patently ridiculous. Elk in particular do not stay in areas which are heavily travelled by vehicles. The only pro-development benefit is money. All other considerations such as scenery, wildlife and non-profit uses will suffer if more roads and timber sales

1

VI-166

Forest Service Response

57-1 The planning process used did not assume that increased roading automatically benefited recreation. The relation of roads (existing and new) to recreation varies depending on the recreation opptunities being provided. Briefly, there are no roads allowed in Primitive areas, no open roads allowed in Semiprimitive Nonmotorized areas, only a certain density of roads allowed in Semiprimitive Motorized, and few restrictions on roads in Roaded Natural and Rural areas. Refer to EIS Chapter VII-Glossary under Recreation Opportunity Spectrum for for definitions. Prescriptions for individual areas were developed based on providing a targeted mix of recreation opportunities in that area. In or near that portion of an area targeted for primitive recreation, roads do not benefit, and in fact are a detriment, to recreation. In that portion of an area targeted for semiprimitive nonmotorized recreation roads will not benefit and may or may not be a detriment to recreation depending on location and road management. In areas targeted for motorized recreation, additional roads can benefit recreation. See response to comments 44-46 and 44-43.

To state that roads harm wildlife is an oversimplification. Certainly they can be very harmful to wildlife. Proposals to build roads into roadless areas are done in an interdisciplinary fashion to consider all resource management needs. The Forest Service mission is not only to protecprotect wildlife but also to provide a mix of recreation opportunities and produce timber and quality water etc. Only 80 miles of the 230 miles of new roads in the Plan will be open for public use. Because use of roads by the public is the greatest threat to wildlife, seasonal restrictions designed to protect wildlife are imposed even on those 80 miles which pass through wildlife sensitive areas. Scheduling of road construction, location of roads, and management of completed roads can be controlled such that wildlife is not harmed.

We agree with the reviewer in terms of the effects of open road densities on wildlife, specifically elk. For that reason, the plan imposes seasonal road closures on all roads passing through crucial preferred winter range and calving areas. Further, the plan calls for all roads built for timber management alone, to be closed to public use. Analysis of the costs of constructing and managing such roads was included as part of the analysis of the planned timber harvest schedule. The only areas selected for timber management were where timber harvest alone could pay for the required roads. This is the primary reason over 55,000 acres of tentatively suitable timberland are not included as part of the suited base to be managed for timber production.

Comment 57

Forest Service Response

EPD - 57 - F - b - C
Proj. No. Orig Type Asst.

are permitted in wilderness areas and roadless areas. 1

I don't envy you the pressure you must be under, especially in the present vicious political climate, but I urge you to put a lot of value on non-development as an alternative. There is little enough wilderness left. The rest of the country is a garbage dump. 2

Sincerely,
Douglas Hatcher
RV Rt
Riverton, WY. 82501

VI-167

57-2 Alternative C is indeed an alternative with a emphasis toward noncommodities. Given the legislative mandates, the multiplicity of statutory requirements which govern Forest Service management, it is not appropriate to have an alternative which completely emphasizes wildlife and recreation values. Not only that, but it is not possible to design such an alternative. The management which promotes one form of recreation does not necessarily promote another form of recreation. The same is true for wildlife. If areas are left unroaded (generally assumed beneficial to wildlife) then some opportunities to benefit wildlife are not available such as vegetation manipulation to improve forage to cover ratios. The management which is best for wildlife is not always best from a recreation standpoint. As stated in DEIS and FEIS under ALTERNATIVES CONSIDERED AND ELIMINATED FROM DETAILED STUDY, the preliminary noncommodity alternative which emphasized wildlife forage, lower risk of watershed degradtion, and a balanced mix of recreation opportunities was combined with recommendations from the Sierra Club and Greater Yellowstone Coalition to become Alternative C. The range of alternatives is specifically discussed on DEIS pages II-49 and II-50 under the heading COMPARISON OF ESTIMATED OUTPUTS. This discussion is retained in the FEIS.

Comment 57

Support the Forest's recommendations to:

★★ Manage the Clark Fork River to maintain its eligibility for wild and scenic status. 3

★★ Withdraw all wilderness and critical grizzly bear habitat from oil and gas development.

Encourage the Shoshone National Forest to:

★★ Manage the Forest with the health of the Greater Yellowstone ecosystem and the preservation of wildlife, recreation, and scenery as the highest priority. Wildlife should be managed to achieve 100% of population objectives. Conflicts between wildlife and other Forest uses should be resolved in favor of wildlife.

★★ Eliminate timber sales and roads from critical grizzly bear habitat.

★★ Eliminate roads into roadless areas.

★★ Eliminate roads and timber sales in the following areas: Deep Lake, Dunoir Valley, Sawmill Creek, North of Sinks Canyon, lands surrounding Worthen Meadows, Fiddlers Lake to Christina Lake, and areas surrounding wilderness areas and Yellowstone National Park. 4

★★ Eliminate any development that conflicts with wildlife use on critical big game range or occupied grizzly bear habitat.

★★ Add alternatives which do not assume benefits to wildlife and recreation from increased roads and timber harvest. 6

Forest Service Response

57-3 The Proposed Plan incorrectly states that we can apply for an extension of the protection period for the River. It is contingent upon an act of Congress to protect the River either by including it in the Wild and Scenic River System or by providing additional temporary protection. It is uncertain at this point whether the Clarks Fork of the Yellowstone River will become a part of the National Wild and Scenic Rivers system. The Forest Service and the Administration are in favor of the River's inclusion. Management activities that are within the discretion of the Forest Service will be designed to maintain the River's eligibility. Other activities that are presently within the discretion of agencies such as BLM (minerals) or Federal Energy Regulatory Commission (hydropower development) could affect eligibility characteristics of the Clarks Fork. In the event such developments are proposed, we would recommend denial to the appropriate agency, until Congress acts. See also response to comment 97-1a.

57-4 In the 1984 Wyoming Wilderness Act, Congress directed that nonselected roadless areas be released for multiple use purposes, and that "buffer areas" were not to be considered adjacent to Wilderness. With this legal direction in mind, some timber sales and the accompanying roads have been scheduled in roadless areas, while other currently roadless areas have not been scheduled. See also rsponse to comments 182-5 and 44-46.

57-6 See response to comments 44-1 and 182-5.

Comment 58

RECEIVED SEP 2 7 1985

FPD - 58 - P - L - B
Proj. No. Orig Type Affil

Forest Supervisor
Shoshoni National Forest
225 N. Yellowstone Ave
Cody, Wyo 82414

Dear Sir:

In order that there be no question, at the onset, from whence I come — I am a forester, logger, and sawmill owner, and I am writing to express some thoughts on your recently published DEIS. I make my entire living by buying government timber and selling various products manufactured therefrom, be it firewood, post, poles, logs or lumber.

If my reaction to your DEIS were put on a balance, I guess it would tip in support of your 50 year plan, although since I am already 50, I am more concerned with the balance of this century since I expect my activities to be curtailed in the 21st century. I express support princiPly because you indicate a slight increase in commercial timber activity over the period. The increase, though small is certainly preferable, in my view, to a decrease — given the already miniscule acreage available for commercial timber activity on the Shoshoni N.F.

Earlier, I stated that I am dependent on government timber for my livelihood. To date

VI-169

Comment 58

Forest Service Response

2 FPD-58-P-L-B
Proj. No. Orig Typo Affil

the USFS has not entered that picture. That dependency in entirely related to the B.L.M. Further I see little hope that that will change in the near future. I am primarily interested in small sales (50 M - 500 M), either green or dead and down. I see very little activity in that sale size on the North end of the forest, and none at all on the Wapiti District. I have had some nice personal visits with staff members on the north end districts, but to date no small timber sales have resulted from these visits. As a forester for some 30 years, I am sure that there are areas that are well suited to this type timber sale activity, but time constraints do not permit me to identify them personally.

1 58-1 Each district has a small number of sales designated to be sold as ranger sales in the size classes suggested.

Most forest users have their own particular axe to grind and to a degree I am no exception, although I am a firm believer in the multiple use concept of forest management. However, there are some remarks and accusations being made recently that, frankly, I'm getting a bit tired of hearing about. I refer specifically to the complaint that the Forest Service does not realize a profit from the sale of timber (acknowledging

FPD - 58 - P - L - B
Proj. No. Orig Type Addl

the implication being that the timber industry is being subsidized or on some sort of dole or welfare. To these complainers I say bunk and horsefeathers. How profitable is the cost to the government of a "wilderness experience" or the cost involved in the taking of a fish or fowl or big game? — Or of feeding a cow? I challenge these people to show me one person in the country who is not somehow touched by the leveling effect of the Federal or State governments mangement and distribution of the nation's money. Lord knows that if every department of government that failed to show a profit from its activities were shut down, all government could be put in a phone booth with room to spare — with the possible exception of the I R S.

Finally I'll state my opinion on grizzly bears. I think that entirely too much time, money and emphasis is being placed on the critter. I was around when bears were eating out of cars and garbage dumps in the Park and elsewhere, and there seemed to be far less problems than now — and they were visible. Lewis and Clark encountered grizzlys as far east as present day North Dakota. Admittedly their territory has shrunk over the past 200 years, but whose hasn't?

Comment 58

FPD-58-P-L-B
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4

Have you talked to Red Cloud lately. I don't necessarily support the extinction of old grig but should it ~~not~~ come to a choice between me or him, I'll choose me every time. Many critters have become extinct over the centuries because of their inability to adapt to a geologically and socially changing world, but quite frankly, I feel no less a person having never seen a dinasaur on the hoof.

Sincerely,

Charles W. Johnstone
P.O. Box 725
1430 Hyway 14A
Ralston, Wyo 82440

Comment 59

RECEIVED SEP 30 1985

FPD - 59 - F - L - E
Proj. No. Orig Type Affil

WYOMING CHAPTER
SIERRA CLUB

September 25, 1985

Steve Mealey
Forest Supervisor
Shoshone National Forest
Cody, Wy. 82414

Dear Steve,

The Wyoming Chapter Sierra Club (WCSC) is pleased to submit the enclosed comments on the Shoshone National Forest Draft land and Resource Management Plan and Draft Environmental Impact Statement.

The WCSC is composed of the 700 members of the Sierra Club residing in Wyoming. In 1985 Forest Planning was selected as one of the top ten priority projects by Sierra Club activists. These members feel strongly that the future management of our national forests is one of the critical environmental issues facing us now. The Wyoming members take advantage of many of the recreational opportunities in the Shoshone National Forest; in addition, national Sierra Club outings are often conducted in the Shoshone's wilderness. WCSC members consider recreation and wildlife important uses of the Shoshone N.F. and stress that these uses be emphasized over commodity production.

As a Member Group of the Greater Yellowstone Coalition, WCSC wants to see a more coordinated approach to Forest Planning taken by the six national forests in the Greater Yellowstone Ecosystem. In cooperation with the GYC, WCSC hired Randall O'Toole of Cascade Holistic Economic Consultants (CHEC) to review the Shoshone Forest Plan and related information available from the Forest Service office in Cody. That report is enclosed and referred to in these comments.

I would like to take this opportunity to thank you and your staff for your cooperation with us during our involvement in the Forest Planning process in the past year. While this Plan is an intimidating document, I have understood it better after having had it explained to me numerous times by members of the planning team. I appreciate your efforts.

I am willing to discuss any part of this comment with you or the planning team should the need arise. I am hopeful our concerns and suggestions will be taken into consideration in the effort to produce an improved Final Plan.

Sincerely,
Meredith Taylor
Meredith Taylor
Vice President
WCSC

"Not blind opposition to progress but opposition to blind progress."

Comment 59

Forest Service Response

WCSC Shoshone Plan comment
page 1

FPD - 59 - F - L - E
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Recreation:

Over half of the Shoshone N.F. is designated wilderness and as such receives protection from natural resource development. Management of the wilderness areas on the Shoshone (North Absaroka, Absaroka, Beartooth, Washakie, Fitzpatrick and Popo Agie) has been minimal recently due to the reduced recreation budget. The Forest Service and others have indicated a trend toward increased recreation use is expected. Therefore, it is important that recreation funding receive more priority in the future than it has in the past in order that areas of the wilderness not become over-used as they have in other parts of the country. Monitoring will be very important ner in order for the Forest Service to identify the high use areas. | 1

59-1 We agree with the comments that point out a problem with funding for wilderness management. There is indeed a critical need for monitoring use levels and levels of change occuring in wilderness if we are to properly administer the forest direction and prescriptions 8A, 8B and 8C as outlined in the Forest Land and Resource Management Plan. The Plan calls for management actions to be applied if monitoring shows use levels are being exceeded. Unfortunately, funding in wilderness management is not keeping pace with the increased responsibilities directed by the Plan. We share the concern of those commenting on this issue and hope that completion of the Plan will result in adequate increases in funding to accomplish the job or that alternate means of funding will become available.

Likewise, with increased wilderness use, it is important that roadless areas surrounding the wilderness areas be protected since they provide for additional primitive recreational opportunities. Although demand doesn't currently exceed supply of wilderness on this forest, it does on many others throughout the West. With Foresight in management decisions, the Forest could protect these roadless areas (such as the Dunoir, North and South Fork Shoshone, Greybull and Wood Rivers among others) for the recreational and wildlife qualities they offer. | 2

59-2 See response to comments 44-46 and 182-5.

In the DEIS p. II-36, dispersed wilderness recreation visitor days are predicted to decrease by 12% below present figures of 229 MRVDs in the first decade and then start increasing by 56% by the end of the planning period. These figures seem faulty and confusing in light of anticipated increases. In addition, in Table II-6, the Preferred Alternative (Alt. D) shows less dispersed wilderness and primitive wilderness than Alternatives A,B or C. Why is this? | 3

59-3 The discussion on page II-36 of the DEIS has been revised to more accurately portray the comparisons between alternatives. Average dispersed recreation use during the period from 1971 to 1982 was 147.2 MRVDs and has increased some since 1982. All alternatives provide capacity for much more than this and estimates for use of wilderness for all alternatives in the first decade is greater than present use. Tables II-5 and II-6 have been revised based on re-analysis of alternatives. The preferred alternative produces less dispersed wilderness recreation use in the first decade than alternatives A, B, or C because it places greater emphasis on pristine and primitive wilderness recreation opportunities. Areas managed for these opportunities have few if any trails and experience less use than areas managed for semiprimitive wilderness opportunities.

Also see response to comment 8-1.

The formula used by the Forest Service for calculating recreational use (DEIS p. III-19) was somewhat complicated and confusing, since it is difficult to understand the application to show recreation capacities. | 4

59-4 The equation shown on page III-19 of the DEIS is for calculation of capacities for each type of recreation opportunity provided on the Forest. In all cases, the capacity of the Forest to provide for dispersed recreation far exceeded anticipated use. Of more concern was anticipated use and the quality of that use. For this reason, anticipated use estimates were used in analysis and display of the relative differences between alternatives. See response to comments 44-46 and 44-50.

By its own figures (LRMP II-82), the Forest Service has shown that the supply of motorized recreation far exceeds the demand. This means that adequate roads and recreational facilities exist on the forest to provide for this use until otherwise proven necessary. Recreation then is not necessarily benefitted from roading. | 5

Recreation values appear low, probably since they were based on national RPA values rather than state values calculated by the Wyoming Game and Fish Dept. or private researchers. WCSC suggests these values be corrected in the Final Plan to more accurately reflect the actual worth of these resources. | 6

59-5 See response to comment 44-46.

59-6 See response to comment 44-7.

While motorized recreation supply appears adequate for the estimated present and future demand, primitive recreation opportunities are expected to increase almost five-fold according to Forest Service figures offered by CFEC p. 10. This is yet one more | 7

59-7 See response to comment 44-46.

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justification for protecting roadless areas for future primitive recreational opportunities. 7

We feel there are several weaknesses in the wilderness management portions of the Plan. The guideline which allows for exceeding acceptable use levels for transition and semi-primitive areas 20% of the time is much too lenient. The 10% standard used for primitive and pristine areas is more reasonable. 8

Also, the wilderness management prescriptions show a bias toward 8B management at the expense of 8A areas. Many of the 8B areas are more appropriately 8A areas. The Plan seems to have used criteria that 8A areas had to be removed from trails by long distances. This is mistaken, since many areas are pristine beginning a few feet off the trail. We urge the Forest Service to reallocate the vast majority of 8B areas to the 8A prescription, particularly along trailless areas between Ishawoa Creek and Deer Creek, off the Fishhawk and Elk Fork Trails and throughout much of the core of the North Absaroka Wilderness. We support your conclusion that there are no 8D areas on the forest. These transition zones are clearly inappropriate except in the most pressured, over-used areas. 9

We are alarmed at the mention of road building in the 8B and 8C prescriptions. We assume that the only reason roads are mentioned is for the possibility of development of exisiting mining claims under the provisions of the Wilderness Act. This should be clarified. We oppose any roads in wilderness as unnecessary. In addition, the standard for allowing road construction on a 60% slope is much too permissive. Such steep slopes would inevitably lead to erosion, loss of soil productivity, destruction of vegetation and loss of wildlife habitat if road-ed. These conditions are unacceptable in designated wilderness. 10

Wild and Scenic Rivers:

WCSC applauds the Forest Service for continuing their recommendation of the Clark's Fork of the Yellowstone River for Wild and Scenic River designation in the Plan. We feel it is unfortunate that Congress has not acted on this recommended river yet. Research has shown no market for the water or power suggested as commodity uses for the dammed river by the Wyoming Water Development Commission. We commend the Forest Service for their support of this prime river and can only hope that support continues until the river is designated as Wyoming's first Wild and Scenic River.

59-8 This planning effort represents the first time a limit on use (in terms of people at one time, (PAOT) per mile of trail, P.A.O.T. per acre, sites per lake, sites per mile of trail or minimum site spacing) has been established on the Shoshone National Forest. These guidelines in the Forest Direction and in the Wilderness Management Prescriptions will enable us to determine a carrying capacity for our wildernesses for the first time. We know that there will be a time of adjustment and "trial and error" as we apply these on the ground. The standard that these limits not be exceeded more than 10% or 20% of the time are rather subjective at this time and either may be adjusted in the future.

59-9 User capacity definitions are dervived from the Recreation Opportunity Spectrum Users Guide, a USDA Forest Service publication. This system was further refined by wilderness research conducted at Colorado State University and the Rocky Mountain Research Station by Driver, McConnel and Brown. The names applied to the different areas, (semiprimitive, primitive, and pristine) are from the original publication. While these may be confusing, it would cause more confusion to rename them. The definitions are based upon sampling of wilderness users for their preferences and needs for wilderness experiences. While not foolproof and not acceptable to some, these numbers do represent state-of-the-art wilderness research.

Some areas now classified as 8B, primitive wilderness, must remain as such because of grazing activities. Grazing inside wilderness is mandated by the 1964 Wilderness Act and subsequent legislation and regulations. Other areas do not qualify as 8A because of traditional user patterns, evidence of human presence, or proximity to trails and other facilities. Existing delineations of 8A, 8B, and 8C management areas are the Forest Service "best guess" at the present time. These delineations can be changed as the need arises.

Existing laws permit the development of valid mineral claims inside wilderness and in some cases this may mean the construction of roads if such are needed for the claimout to reasonably develop his mineral rights.

59-10 Few valid claims exist in wilderness on the Shoshone National Forest. Naturally, every effort would be made to minimize impacts of roads in wilderness.

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Timber:

Economic justifications for timber sales on the scale that is proposed in the Preferred Alternative (D) are lacking. More people are employed for recreation, tourism and wildlife related jobs in and around the forest than for logging. This is not to say that we do not care to see any logging on the forest, rather that logging be accomplished in lower volumes than proposed in the Preferred Alternative and with a sensitivity for the other values being protected. WCSC sees the contribution the small-scale sawmills make to the towns of Lander, Dubois and Cody. These multi-dimensional sawmills offer a steady source of employment to a few dozen people. Calculations show that between the Wyoming Wood Products Mill in Lander, Darwin Wilson's Mill in Dubois and Cody Lumber an annual total harvest of 8 mmbf is necessary. It is difficult then, in terms of community stability, to understand why the Forest Plan proposes 10-11 mmbf annual cut. 11

59-11 The level of timber harvest proposed is based on almost entirely on timber economics alone, not considering benefits to recreation, wildlife, and community stability. Employment and other benefits of recreation, tourism, and wildlife were considered in the planning process. The Forest Service sees no reason to reduce harvest levels below that which was shown to provide a positive economic return. See also response to comments 18-3 and 44-44.

The Forest Plan argues that recreation and other resources are benefitted by vegetative manipulation (logging). This is a dubious if not erroneous assumption that is based on supposed mutual benefits of the roads by recreation and logging interests. Roads are used for motorized recreation on the forest; however, the Forest Plan itself states in the LRMP p. II-82, "Forestwide capacity for dispersed nonwilderness recreation exceeds expected demand." Recreation cannot be used as a justification for the roads proposed in the Forest Plan, because 1. the demand is not evident and 2. the roads are primarily scheduled for closure following completion of logging. 12

59-12 See response to comment 44-43, 44-46 and 182-5.

It is frustrating to see logging used as the treatment of choice for Commandra Blister Rust even though it has not been shown to be effective in controlling the disease problem. Commandra is causing some real timber problems on the forest and it should be controlled or eradicated by whatever means works. Historically, forests have been cured of their disease problems by wildfire. While this may be inappropriate in this day and age, controlled burns for disease eradication should not be precluded. We are pleased to see fire being considered for some vegetative treatments and fire suppression being reduced on the Wind River District. This proposed policy should be extended to other parts of the forest such as the Lander District where fire could enhance some of the areas in the south that have been killed by pine beetles. 13

59-13 The importance of fire in its natural role in the ecosystem has been recognized, and the fire suppression guidelines in Appendix F of the Plan has been further liberalized between the proposed and final Forest Plan.

The 120-year replacement rate for timber on the forest is hypothetical and yet to be seen. Reduction in the size of clearcuts should promote regeneration of the trees, but regular monitoring of the cut areas is critical to achieving a sustained yield on the Shoshone. If the timber base does not provide the estimated wood volume in the future, reductions in harvest should be implemented.

We are pleased to see a reduction in the suitable timber acreage has been proposed since the draft Plan was released. In areas of unstable soils such as occur on many parts of the Absaroka Range it is important to keep the timber sales on 10% or less slopes to prevent unnecessary erosion. 14

59-14 Prior to any timber sale, an environmental analysis is accomplished. This analysis includes a detailed investigation of the soil types that are likely to be affected, particularly in regard to erosion potential, and productivity following disturbance. Silvicultural prescriptions are then designed to meet the limitations of the soil; if soil conditions are prohibitive, no cutting will be allowed. This intention is reflected in the standards and guidelines presented in the Forest Plan (blue and yellow pages).

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We compliment the planning team for removing much of the steeper slope timber from the timber base. In addition, we would suggest that roadless areas that were not included in the Wyoming Wilderness Act be removed from timber suitability. These areas include much of what is considered prime recreation areas and important wildlife habitat. Many of these areas are included in what has been defined as the Greater Yellowstone Ecosystem and as such deserves protection as a biological base for the millions of vertebrates and invertebrates present. | 15

59-15 See response to comment 44-46.

Harvesting timber at a volume reduced from current levels makes economic sense as well, since timber sales could be dispersed among the various areas already roaded thus preventing deficit timber sales in the future. | 11

We encourage logging in existing roaded areas. Logging has repeatedly been cited for its wildlife habitat improvement due to regeneration of the understory; however, the conditions contributing to use of the area by wildlife following the logging demand closure and/or restriction of the roads into the area. Even so, some temporary displacement occurs.[1] Timber sales which cover several years in an area tend to delay the return of elk use to an area previously inhabited. The problem that arises in such a situation is - where do the elk go when displaced from habitat that has already reached its limitation? There will be inevitable impact on the herd in such a case. This is not a problem exclusive to elk. Moose that were displaced by timber sales in the Union Pass/ Sheridan Creek area in the past decade have not returned. | 16

59-16 Timber harvest will follow Standards and Guidelines and the NEPA process involving Wyoming Game and Fish personnal and will assure that escape cover is available. Harvest practices have changed considerably since the Union Pass/Sheridan Creek area was harvested.

Hiding cover and thermal cover is important to consider when harvesting timber in wildlife habitat. While the Plan addresses these concerns in Planning Problem Statement #6 IRMP p. II-90, we feel the Forest Service should be certain regeneration is adequate before allowing remaining trees to be cut in an area. | 17

59-17 Standards for determining regeneration success are contained in Plan Chapter III Forest Direction and Management Area Direction.

Specific areas we suggest not be proposed for logging include: Sawmill Creek, Little Popo Agie, Five and Six Mile Creeks, Wolf Creek, Lodgepole Creek, Table Mountain, Trail Creek, Little Sunlight Creek, Russell Creek, Dick Creek, Timber Creek, Dead Indian Gulch and Ghost Creek. The reason for this suggestion is primarily for protection of the areas for wildlife habitat; however, some recreational use is indicated especially in the Dunoir area. Areas where conflicting uses with logging occur such as grizzly bear occupation, should be resolved with the final EIS. | 18

59-18 The standards for timber harvest included in the Plan are based on using timber harvest to improve wildlife habitat. Public use of roads used primarily for logging appears to have a detrimental effect on wildlife. Because of this, the standards in the Plan call for closing all such roads to the general public. For specifics on the areas mentioned, see Appendices A and J to the Plan to identify the management strategies for them and the plans for timber harvest. Also see response to comment 51-5.

The Forest Service's optimism regarding the proposed use

[1] Lyon, L. Jack, Influences of Logging and Weather on Elk Distribution in Western Montana, USFS, USDA, Ogden, Utah, 1979.

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of grizzly bear Situation I for timber harvest demands scrutiny. Considering the low bear population in the Greater Yellowstone area at present, logging important grizzly habitat seems to be placing high stakes on the chances of bear recovery in the near future. Increased contact has usually caused increased conflict between bears and humans. Unless bear mortalities are reduced significantly, there is little hope for the bears to recover in the planning period. We do not feel that the Endangered Species Act allows for such risks in recovery of threatened and engangered species. Rather, the act mandates that public land management agencies not jeopardize the species with certain management proposals. We appreciate the restrictions the Forest Service has scheduled for grizzly habitat, but question if the precautions will be adequate protection for the bears. Rather, we urge the Forest Service to prohibit logging in Situation I grizzly habitat. It appears to us that the risk of impacting grizzlies is high enough to warrant this conservative attitude. The Yellowstone grizzly bear population is not one that seems appropriate for experimentation considering the low number and instability. **19**

59-19 We are following Greater Yellowstone Grizzly Bear Guidelines (GYGBG) for activities in Situation 1 and 2 and all projects will have Consultation with the Fish and Wildlife Service for clearance and mitigating measures. See also the Fish and Wildlife Service biological opinion on the Plan in Plan Appendix H.

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Oil and Gas Leasing:

The Shoshone National Forest deserves credit for its efforts to improve protection of wildlife and recreation values on the forest by imposing stricter stipulations on lease recommendations to the BLM. The scale of this protection is difficult to ascertain, however, since there is no forest-wide map showing where surface occupancy will be allowed or where other restrictions will be suggested. These descriptions are partially covered in the Forest Plan Detail (Appendix J), but there, too, it is not clear where the proposed restrictions will occur.

Oil and gas leasing constitutes a major program affecting the lands of the Shoshone N.F. While it is often difficult to know what surface activity will result from the issuance of a lease, nonetheless, the range of possible activities can be predetermined, and the effects of that range of activities on the other resources of the forest can be evaluated. Appendix J does not adequately cover cumulative effects of oil and gas leasing. **20**

The 935,000 acres open to leasing in the Draft Plan leads to many problems. It is vital that the possible effects of full exercise of the lease rights be evaluated prior to the issuance of the lease. The present environmental review on the Wapiti Lease Group indicates that an adequate process is underway to consider these effects. We encourage you to continue such environmental review with complete public comment periods for other lease applications as well as the renewal of existing leases. We do not consider the recent scoping statement issued on the remaining 100 lease applications a satisfactory way of processing leases spread out from one end of the forest to the other. We would prefer to see them dealt with on a drainage-specific basis in order to determine the effects of the exploration and development. **21**

It is to the Shoshone N.F. team's credit that oil and gas leasing is prohibited in Situation I grizzly habitat. This type of protection is important if there is to be cooperation in the recovery of the grizzly. To assure that oil and gas leasing is prohibited in Situation I grizzly habitat in the future, we suggest that the Forest Service request a Congressional withdrawl for these areas. NFMA regulations part 219.22 (d) states that "The potential for future mineral development and potential need for withdrawl of areas from development;" should be recognized. We feel this is an appropriate situation in which to apply this withdrawl regulation. **22**

In addition to Situation I grizzly habitat, we urge that the Forest Service consider lease denial for crucial preferred winter range (CPWR) and other sensitive areas where the risk of potential harm to the areas or users surpasses the potential benefits. **23**

Enclosed in the Forest Plan is a map "Evaluation of Oil and Gas Potential - Shoshone National Forest." To date 31 wells have been drilled on the forest and none of these has hit commercial levels of hydrocarbons. So many unsuccessful attempts at drilling

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59-20 Appendix J entries are intended to provide a detailed look at proposed management activities, practices and costs. It is beyond the scope of this document to provide for each analysis area the full range of consequences for all possible management activities. See also response to comments 128-4, 160-1, and 33-2.

59-21 The analysis procedures being used to investigate the Wapiti Lease Group (South Fork) is presented in Plan, Appendix K. These procedures must be used when the Forest Plan is implemented. We agree that a drainage basin is often an approrpriate analysis unit.

59-22 The recommendation for oil and gas in Grizzly Bear Situation I habitat is "no lease", except for a one half mile strip along the perimeter of "no surface occupancy". This type of area is not withdrawn. In the event of a recovered grizzly bear population, leasing would be considered.

59-23 Management of crucial preferred winter range, and other sensitive wildlife habitats, was designed in consultation with the Wyoming Game and Fish Department. It has been determined that generally, some operations can occur within these areas outside of critical times. Because of the possibilities for mitigation using seasonal controls, lease denial in such areas is not reasonable.

The procedure used to apply stipulations and recommended operating procedures found in Plan, Appendix K addresses crucial preferred winter range. This procedure is designed to recognize the primacy of some resources in some situations over oil and gas. The procedure is flexible enough, by providing for additional environmental analysis, to encompass the needs of wildlife in specific areas as they are identified in the future. We maintain that oil and gas can be allowed and controlled in ways that will assure wildlife needs are met.

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for oil and gas following repeated seismograph studies makes us question the credibility of the mineral potential map. We suggest that the Forest Service recommend leasing areas of low or no oil and gas potential. With little hope of finding commercial deposits of hydrocarbons, the risk of jeopardizing wildlife and recreation values that predominate is too high. These areas include much of the Wind River, Lander and Clark's Fork Districts. **24**

The Social Impact Analysis performed in 1984 showed that non-commodity emphasis in forest management produced the least polarization in the community. If this is truly a goal, it would seem in the best interest of the communities surrounding the Shoshone N.F. to restrict leasing to areas where risk of conflicts with other uses on the forest is lowest. It is definitely not in the best interest of affected parties to lease areas such as the North and South Forks of the Shoshone River where the potential is quite high. **24a**

A recently-released report commissioned by the Wyoming Futures Project stated that Wyoming's resource industries will probably "remain static or decline" while tourism is the most appropriate area for Wyoming's leaders to develop. Tourism is a growing industry which is clean, consistent with "most of Wyoming's values and builds naturally on Wyoming's natural beauty, wildlife and remoteness." It is important that public land management contribute to the protection of the qualities that will provide the basis for Wyoming's economy in the near future. **25**

59-24 At present, the Forest Service is constrained from making lease recommendations based upon subsurface values. This is the authority of the BLM. The Forest Service charter is to recommend lease denial or appropriate regulatory stipulations based upon the capabilities or sensitivities of surface resources. We should note that high oil and gas potential areas coincide with land types (on the Greybull Ranger District) that are among the most erodable on the Forest. To concentrate leasing in these areas without regard to sensitivity of soil and water resources would be unacceptable.

59-24a The Forest Plan calls for recommending leases denial or no-surface-occupancy stipulations where conflicts with other uses cannot be satisfactorily mitigated by various controls on operations. In many cases conflicts can be mitigated and lease denial in these areas would constitute an arbitrary and capricious restriction on mineral activity.

59-25 The effects of the proposed action and alternatives to that action on the economy of the region were analyzed with a state-of-the-art input-output model. This model examined each sector of the economy and the effects of each alternative on each sector in terms of number of jobs, personal income, property income, and unemployment. This analysis indicates that the preferred alternative creates approximately 300 more jobs than if current management were to continue. While it is important to consider local and State interests, National interests must be kept in mind as well. See also Chapter IV of the EIS under Economic Effects and Social Effects.

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Grazing:

While WCSC accepts grazing of livestock on public lands as a beneficial use to a community, we feel that many abuses have occurred on the land to date that we would like to avoid in the future. We are pleased to see that areas of overgrazing have been corrected in some areas with reduced livestock and rest/rotation schedules implemented.

Of particular concern is livestock grazing that is allowed unherded in riparian areas. Several examples have been mentioned to us by concerned individuals who complained about the heavy concentration of livestock in tributaries of the North Fork Shoshone, the East Fork Wind River, Bear Creek, Dunoir, Wood River and on alpine areas of the Beartooth Plateau. Oftentimes these overuses of certain areas preclude others from using them for the rest of the year. Recreational livestock forage is not available and the quality of the water and ground are seriously degraded from fecal contamination. We encourage the Forest Service to avoid situations like this by requiring herders, and where necessary, build fences. We are pleased to see these solutions considered in the Plan and look forward to the improvement of this problem.

26 59-26 These improvements are planned for. See detailed prescriptions in Appendix J of the Forest Plan.

12,000 AUMs which are currently permitted for sheep grazing allottments on the Upper Wood River, Greybull River and Wind River drainages are not being used. Many of these grazing allottments are in alpine terrain on the divides and have historically been sensitive to the overgrazing that has contributed to decreased regeneration of forage and increased soil erosion. It is recommended that these grazing allottments not be transferred to cattle, but rather be retired for use as wildlife summer range.

27 59-27 Neither analysis area 194 nor analysis area 195 will be managed for domestic livestock. Should a conversion from sheep to cattle be proposed, only after an analysis concludes the range is suitable will a conversion be made.

Increases of 33% in available forage are expected during the planning period and following range improvements scheduled throughout the planning period. (DEIS, II-35.) We have been unable to find any allocation of that increased forage, however. Are permitted livestock numbers to increase or will the anticipated increase in AUMs be left for wildlife or both? This needs to be defined in the Final Plan.

28 59-28 The forage would be allocated to both unless there is a change in Wyoming Game and Fish population objectives or Range Allotment Management Plans.

WCSC is supportive of range improvements the Forest Service has accomplished by sagebrush burning in select areas of the forest. We feel the desired effect of providing more forage while leaving substantial acreage of sagebrush has been achieved. We encourage future continuation of this practice. As with all aspects of the Plan, monitoring will be the proof of the pudding. An example of situations that need correction is the recent case of cattle grazing on the East Fork 80 days after they were supposed to have been removed. Personnel who will watchdog their areas responsibly are needed to insure that proper utilization is taking place. Reasonable forage must be left for recreational livestock and outfitters as well.

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In the LRMP p. III-37 the grazing statement should be rewritten to say "prohibit new range improvement structures other than corrals, fences or water developments essential to sustain permitted numbers which will not harm the other multiple use values of the area." We understand that the Forest Service cannot legally reduce grazing in wilderness because of the wilderness designation itself. We support this approach. However, the Forest Service does have the option of reducing grazing inside of wilderness if the resource is being harmed. By stating the grazing direction in the way it is in the Plan, the option of reducing grazing - even if it is harmful to the resource - is abandoned.

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59-29 All structural improvements will be supported by a Management Plan and will have gone through the NEPA process which will have evaluated impact on other resources.

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Roading:

According to the LRMP p. II-90, the Forest Service plans to construct or reconstruct an average of 13.3 miles of road annually. Roading has proven itself to be the most costly part of the silvicultural management program and at the same time, the most serious impact to wildlife and scenic values on the forest. WCSC feels that road facilities on the Shoshone N.F. are sufficient and proposals for new roads reduced in the Final Plan.

Some contradictions in proposed roads are apparent when comparing the figures in various parts of the EIS and Plan. In the DEIS, p. II-54, 23.8 miles road per year is scheduled in the first decade of the planning period. This is a sizeable increase over the average of 13.3 miles cited above. However, it is possible more roads would be built in the earlier part of the planning period than later on. When consulting the Preferred Alternative (D) to learn where these proposed roads are, we counted over 30 miles of road construction/reconstruction planned in the first decade. Can this be correct? **30**

59-30 In response to numerous concerns, the number of acres managed for timber harvest and the resultant amount of roads has been reduced in the final Plan. In the next fifty years, the Plan projects only eighty miles of new road which will be open to the public. There is projected 120 miles of existing road which will be improved and remain open to the public. An additional 150 miles of new road, and 255 miles of reconstructed existing roads are projected to be closed to the public within the 50 year period. Road construction and reconstruction figures have been corrected. See also response to comments 182-5, 33-9, 80-5, and 44-46.

WCSC strongly recommends against further roading of roadless areas within the Shoshone N.F. on the grounds that 1. there are an adequate number of roads on the forest to provide access already, 2. the roadless areas provide a higher value to the forest as roadless areas for wildlife habitat and recreation opportunity, 3. road density figures proposed by the Forest Service in the LRMP p. III-128 suggest an average road density of 2 miles per square mile are too high. **31**

59-31 In the 1984 Wyoming Wilderness Act, Congress directed that nonselected roadless areas be released for multiple use purposes, and that "buffer areas" were not to be considered adjacent to Wilderness. With this legal direction in mind, some timber sales and the accompanying roads have been scheduled in roadless areas, while other currently roadless areas have not been scheduled. See also rsponse to comments 182-5 and 44-46.

Figures used by wildlife managers indicate that road density should remain less than 1.2 miles per square mile if impact on elk and other wildlife is to be minimized. Apparently above this level, habitat effectiveness is reduced by 25% for each mile of increased road density. Thus at 2 miles per square mile of road the efficiency of the habitat is reduced by about 50%. If the Forest Service plans to meet the Wyoming Game and Fish Department objectives for wildlife populations, habitat protection must be considered a necessary means to that end. **32**

59-32 The Forest Service is very much aware that too many open roads in an area, and in fact even one open road in some areas, can be very detrimental to big game. Once the Forest Plan is finalized, we will still go through the environmental analysis process for each project proposed. At that time the Game and Fish will be consulted as appropriate as part of the environmental analysis. Their recommendations will be incorporated into each project.

To access all timber in a continuously timbered area requires approximately 4 miles of road per square mile. The majority of these roads are local and are scheduled to be closed following timber harvest. Road management decisions and the decisions to build new roads are based on a consideration of all resources in an area, including wildlife needs and the targeted recreation opportunities being provided. The Forest Service is well aware of problems in road closure enforcement. See also response to comments 146-14. The standards for road densities contained in the forest standards and guidelines and in the individual management area prescriptions have remained unchanged.

Road closures are encouraged and efforts by the Forest Service to engineer road closures that will actually obstruct travel rather than invite monkey wrenching are applauded. The above figures on road density impacts refer to open roads of course, which can be given as a justification of the closures to the public. "Road closures, rather than road construction and timber harvest, are likely to have the greatest returns in elk habitat improvement." (CHEC p. 6.)

Specific roads that the WCSC opposes in the Plan are the new construction proposed in the Table Mountain area on the Clark's Fork District and the Brent Creek to Trail Lake area in the Dunoir. We feel that there are enough roads in both of these areas and that further roading would only jeopardize existing values. Regarding the Brent Creek Road, we feel road construction and reconstruction could further reduce an already narrowed elk migration route to the East Fork Elk Winter Range. In addition, **33**

59-33 Further economic analysis has shown that timber activity from the Table Mtn. area during the first decade would not be viable; therefore, all timber harvest has been rescheduled from the first decade. The Plan has been revised to reflect this change.

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harvest levels of the elk could exceed desired numbers with such extensive roading through the major migration route of 2500 elk.

As acknowledged by the Forest Service (DEIS, p. III-68), "Road maintenance funds have not been sufficient in recent years. The result has been an overall shortening of road design life resulting in more frequent expenditures for reconstruction." This situation is unfortunate for recreationists using access roads onto the forest. Many roads have seen severe deterioration and erosion and are impassable in wet weather. In effect, the roads see little or no maintenance work if there are no timber sales near them; ie: the roads are strictly for recreational access. This is contradictory of the claim that recreation is benefitted by timber production because of the roads if the roads are not then maintained. We suggest that the Forest Service make more of an effort to support the existing road system before new roads are planned on the forest. In particular need of supplemental graveling and grading are the roads up the East Fork Wind River and Horse Creek. In any storm these roads are dangerous at best and sometimes unnegotiable.

34

59-34 In response to numerous concerns, the number of acres managed for timber harvest and the resultant amount of roads has been reduced in the final plan. In the next fifty years, the plan direction calls for only eighty miles of new road construction which will be open to the public. There will be an additional 120 miles of existing road which will be improved, and will remain open to the public. An additional 150 miles of new road, and 255 miles of reconstructed existing roads will be closed to the public within the 50 year period. Road construction and reconstruction figures have been corrected in both documents. See also response to comments 182-5 and 44-46.

The Forest Plan will guide management over the next 10 to 15 years and will be revised every 15 years or sooner in response to major changes in information or needs of the American public. Projections over 50 years are provided to portray long term consequences only.

Comment 59

Forest Service Response

WCSC comment
page 12

Prescriptions:

WCSC suggests a few changes in prescription allocations within the Plan that would enhance whatever alternative is chosen. The disparity between semi-primitive non-motorized recreation (3A) and primitive recreation (3B) is so great as to lead one to investigate these differences. The prescription description becomes alarmingly apparent when one reads that logging is allowed on the former (339,000 acres) but not on the latter (16,000 acres) in the Preferred Alternative. We find this a real problem since there are so many areas surrounding exisiting wilderness areas prescribed for 3A. We would like to see those areas without roads built in them currently to be changed to 3B. **35**

59-35 See response to comment 44-46.

Likewise, we suggest a change in prescription for areas listed for 7E such as Table Mountain, Wolf Creek and Five and Six Mile Creeks to 3B. These roadless areas we recommend to remain as such for the protection of the high quality of recreation, wildlife and visuals that the areas are known for. **36**

59-36 In the 1984 Wyoming Wilderness Act, Congress directed that nonselected roadless areas be released for multiple use purposes, and that "buffer areas" were not to be considered adjacent to wilderness. With this in mind, the Wolf Creek timber sale has been included in the Forest Plan. Planned sales between Five Mile Creek and the Dunoir Special Management Unit have not been included in the Forest Plan; this has been allocated to Management Area 3A rather than Management Area 7E. No logging or road building will take place in the Dunoir Special Management Unit. See also response to comment 44-46.

We refer you to specific prescription changes recommended by the Wyoming Game and Fish Dept. and the Wyoming Wildlife Federation with which we agree.

Cultural Resources:

WCSC is pleased to see the Forest Service stating "a need to establish a program of active protection for known cultural sites,"in the LRMP p. II-83. However, there was no proposal for this project. It is important that the need is defined and we encourage you to carry out an active research program on known sites. Furthermore, we feel it is important that the Forest Service actively survey the forest in general for historic sites. There is a great deal of history buried beneath the Shoshone N.F. that would be of interest to historians and much of the general public as well. We encourage the Forest Service to include a specific plan outlined to preserve historical parts of the forest in the final Forest Plan. **37**

59-37 Cultural Resource evaluation and protection is emphasized (see General Direction, Plan page III-21). The program will include coordination with other federal and state agencies to assure that specific areas, such as the South Pass City area, are adequately protected. A full-time archaeologist now has responsibilities for National Forests in Wyoming. Each Forest has paraprofessionals responsible for cultural resource inventories. The Warm Springs Flume is an inventoried cultural resource site and it will be protected as such on both the Forest and neighboring lands administered by the BLM.

In particular, we would like to see historical sites in the South Pass City area preserved with more emphasis on coordination with the Wyoming Recreation Committee and the BLM who are also working on such projects.

Comment 59

Supplemental to Wyoming Chapter Sierra Club
Shoshone N.P. Draft Plan Comment

FPD-59-F-L-E
Proj. No. Orig Type Area

Prescriptions:

Specific examples of prescription changes we would like to see in the Final Plan include:

1. Less 3A and more 3B. The disparity between these two prescriptions is tremendous (339,000 versus 16,000). Our main problem with 3A is that even though the emphasis is supposedly on "semi-primitive nonmotorized recreation" roading and logging are allowed. We find this particularly disturbing in areas that border the wilderness areas and the Dunoir Special Management Unit such as: North Fork Popo Agie, Jade Lake, Bonneville Pass, Esmond Creek, Bear Creek Canyon, East side of Wiggins Fork, between Bear Basin and Castle Rock, Cottonwood Peak area, Middle Fork of Wood River, Carter Mountain, along the North and South Forks of the Shoshone, Trout Creek, and much of the Beartooth Mountains. 38

2. We find 4B prescription acreage particularly low (12,900) and think more of the wildlife on the Shoshone would benefit if 4B were recommended for critical habitat. 39

3. We appreciate the 4D prescription for improvement of wildlife habitat by aspen management, however, we suggest that a cooperative program between the Wyoming Game and Fish Department be implemented that would reintroduce beavers for natural control of aspen groves wherever possible. In many areas beavers have been eradicated from over-trapping. Traditionally the beaver have kept aspen clones maintained to produce new growth and in many areas of the Shoshone N.F. could do so again if reintroduced where needed. 40

4. We definitely think there is too much 7E prescription in the Preferred Alternative. Specific areas where we don't want to see "wood fiber production" is between Christina and Fiddlers Lake, along the wilderness area boundaries, Wolf Creek, Five and Six Mile Creeks, along the Wiggins Fork and around Double Cabin, Trout Creek, Robber's Roost and between Sunlight and Crandall. 41

5. As stated in the recreation section of the WCSC comment, we prefer to see less 8C wilderness and more of the management done along the lines of the 8A and 8B prescriptions. We notice that roads are mentioned for authorized access in the 8C description. While we presume this is probably considered for mining claims, WCSC does not want to see roads being built into wilderness areas under any conditions. 42

6. The suggestions for management under Prescription 9A are supported by the WCSC for riparian areas. In particular we feel that range resource management of riparian areas needs improvement by implementation of the general direction of the prescription. This is how monitoring will be the king pin on which the success of the Forest Plan rests. As stated in the Monitoring and Evaluation portion of the comment, we feel it is critical to the success of the Plan that ongoing surveillance takes place and corrective measures are taken when necessary.

Forest Service Response

59-38 See response to comment 44-46.

59-39 Delineation of CPWR (5A) was jointly developed by Forest Service and Wyoming Game and Fish. 4B emphasizes management for indicator species such as bald eagles and peregrine falcons, and was designated based on data provided by Wyoming Game and Fish specialists.

59-40 The option for beaver reintroduction is not precluded in the Plan. In many areas, beaver have eliminated aspen stands and abandoned the area naturally. Reintroduction will be reintroduced only after analysis by Wyoming Game and Fish and Forest Service.

59-41 In response to numerous concerns, the number of acres managed for timber harvest and the resultant amount of roads has been reduced in the final Plan. In the next fifty years, the Plan projects only eighty miles of new road which will be open to the public. There is projected 120 miles of existing road which will be improved and remain open to the public. An additional 150 miles of new road, and 255 miles of reconstructed existing roads are projected to be closed to the public within the 50 year period. Road construction and reconstruction figures have been corrected. See also response to comments 182-5, 33-9, 80-5, and 44-46.

59-42 User capacity definitions are dervived from the Recreation Opportunity Spectrum Users Guide, a USDA Forest Service publication. This system was further refined by wilderness research conducted at Colorado State University and the Rocky Mountain Research Station by Driver, McConnel and Brown. The names applied to the different areas, (semiprimitive, primitive, and pristine) are from the original publication. While these may be confusing, it would cause more confusion to rename them. The definitions are based upon sampling of wilderness users for their preferences and needs for wilderness experiences. While not foolproof and not acceptable to some, these numbers do represent state-of-the-art wilderness research.

Some areas now classified as 8B, primitive wilderness, must remain as such because of grazing activities. Grazing inside wilderness is mandated by the 1964 Wilderness Act and subsequent legislation and regulations. Other areas do not qualify as 8A because of traditional user patterns, evidence of human presence, or proximity to trails and other facilities. Existing delineations of 8A, 8B, and 8C management areas are the Forest Service "best guess" at the present time. These delineations can be changed as the need arises.

Existing laws permit the development of valid mineral claims inside wilderness and in some cases this may mean the construction of roads if such are needed for the claimout to reasonably develop his mineral rights.

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Forest Service Response

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FPD-59-F-L-E

Alternatives:

It is difficult for the WCSC to select one of the available alternatives in the Plan, since none of them offers a satisfactory balance of management for wildlife and recreation needs on the forest. Even though we offered some input for the "non-commodity alternative" (Alternative C), it falls short of what we would like to see happen on the forest during the next 50 years. Certainly, it is not actually a non-commodity alternative, because the commodity output levels are not far removed from any of the other alternatives except Alternative E (Reduced Budget).

This lack of an alternative that completely emphasizes wildlife and recreation values on the forest without the current commodity production levels is a major weakness of the Plan. The differences between the commodity output levels of the various alternatives do not deviate more than 20% from the average (which is often the Alternative D level). This is a very narrow range of alternatives and we feel this problem needs correcting in the Final Plan.

The type of alternative we would select would be one that emphasized wildlife, recreation, visual quality, air and water quality maintenance without concurrently high levels of commodity production. This would demand a deviation from existing philosophy for the Forest Service, since some roads would then be considered for their recreational value only. The opposite philosophy occurs at present, since all alternatives show a direct correlation between timber and recreation because of the mutual road use. We refer you to CHEC p. 13 for further discussion on this subject.

In some areas of the Shoshone N.F., logging and motorized recreation may be an appropriate use of the roads, but we are not dealing with business as usual forests in northwestern Wyoming. Higher protection is being demanded for certain areas of the Shoshone and some roads may only have a need for recreational use on them, such as in the Wolf Creek area. As part of the Greater Yellowstone Ecosystem, we do not feel that commodity production at a level that is higher than necessary is appropriate. The values we are trying to protect have more worth to the people of the nation and indeed the world as an area where they can see beautiful vistas, abundant wildlife and catch fish than as an area that produces marginal quantities of timber and low-grade crude oil. Certainly some production of these commodities can be justified, but not if the production jeopardizes the quality of the higher uses.

WCSC urges the planning team to include in the Final Plan an alternative that really emphasizes the wildlife, recreation, water, air and visual values without the resource extraction that is incompatible with these values.

43 59-43 Alternative C is indeed an alternative with a emphasis toward noncommodities. Given the legislative mandates, the multiplicity of statutory requirements which govern Forest Service management, it is not appropriate to have an alternative which completely emphasizes wildlife and recreation values. The management which promotes one form of recreation does not necessarily promote another form of recreation. The same is true for wildlife. If areas are left unroaded (generally assumed beneficial to wildlife) then some opportunities to benefit wildlife are not available such as vegetation manipulation to improve forage to cover ratios. The management which is best for wildlife is not always best from a recreation standpoint. As stated in DEIS and FEIS under ALTERNATIVES CONSIDERED AND ELIMINATED FROM DETAILED STUDY, the preliminary noncommodity alternative which emphasized wildlife forage, lowered risk of watershed degradtion, and a balanced mix of recreation opportunities was combined with recommendations from the Sierra Club and Greater Yellowstone Coalition to become Alternative C. The range of alternatives is specifically discussed on DEIS pages II-49 and II-50 under the heading COMPARISON OF ESTIMATED OUTPUTS. This discussion is retained in the FEIS.

Comment 59

Forest Service Response

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FFO: 59-F-L-E

Wildlife and Fish:

WCSC is pleased to read that the Forest Service plans to meet all of the Wyoming Game and Fish Department wildlife population objectives outside of the North Fork elk herd. We would like to see this population accounted for in the AUMs for wildlife as well. However, it is unclear how this can be achieved when the Forest Service proposes to "maintain habitat capability at a level at least 80% of potential capability" for indicator species and "90% of the habitat needed to support the state population goals" for species commonly hunted, fished or trapped. It seems impossible to expect 100% of the state's objectives to be met while only allowing habitat requirement for 80-90% of them. This should be corrected in the final Plan so that 100% of the wildlife habitat necessary is provided.

46 59-46 See response to comment 8-5. Habitat capability and population objectives are not synonymous. Management for 90 percent of the habitat capability will in most instances provide habitat in excess of the needs for population objectives. These standards do not related to existing populations; but to the capability of the habitat to provide optimum numbers. Population objectives will be met in all cases except the North Fork elk herd.

In the LRMP p. II-12, Table III-1 estimates that consumptive wildlife use equals nonconsumptive use currently, and even more surprising, that trends show no increase in either of these uses during the next 50 years. While figures for nonconsumptive use are difficult to locate, it is apparent to any photographer, bird-watcher, swimmer, artist that nonconsumptive use probably far surpasses consumptive use. Certainly demands for both of these uses of wildlife will increase during the planning period because of population growth and increased interest in visiting areas such as the Shoshone N.F. where wilderness and wildlife are available.

47 59-47 We agree that nonconsumptive wildlife use probably exceeds consumptive use; however, there is no existing data to indicate what the difference is forestwide. We therefore took a conservative approach and used a 1:1 ratio.

In the DEIS p. III-36, Table III-13 shows the wildlife population objectives for 1984. These objectives are satisfactory for elk, bighorn sheep and black bear, but the figures for deer (white-tail and mule deer), moose mountain goat and mountain lion are significantly lower than the objectives. This should be corrected. Conversations with wildlife managers led to some questions as to the validity of the population objective figures.

48 59-48 The intent of the Plan is to meet the objectives as stated.

The Management Situation in the LRMP p. II-83 states that "wildlife habitat improvement should be concentrated primarily on winter ranges." Unfortunately, many of the so-called wildlife habitat improvements occur as logging in areas that are not necessarily winter range. The sagebrush burning projects are a good idea to augment the AUMs available on winter range, but the logging can only provide forage in migratory or transitional range where it may or may not be needed.

49 59-49 Timber sales do not count as habitat improvement and is not reported as target accomplishment.

More than with any other area of the Plan, monitoring of wildlife is of the utmost importance. Wildlife monitoring funds have been lacking in the past and seem low as itemized per analysis area in Appendix J. We refer you to the comments submitted by the Wyoming Game and Fish Department for more detail on specific wildlife discussion. In several parts of the Plan, the Forest Service suggested increased cooperation and communication with the Wyoming Game and Fish Dept. We encourage these efforts to achieving more sound management direction and policies for wildlife and habitat.

50 59-50 See response to Wyoming Game and Fish comments.

Comment 59

WCSC comment
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Earlier we referred to no increase in the trend for consumptive/ nonconsumptive wildlife use on the forest. It is interesting that a similar lack of trend increase is noted for fishing use despite projections that expect an increase elsewhere in the Plan(p. II-45).

As mentioned elsewhere in this comment, the Wyoming Futures Project forecasts a substantial increase in tourism and recreation in Wyoming in the near future. WCSC supports this theory and urges public land managers to provide for this increase in their management plans. As these areas of the economy increase in importance, the demands on resources will increase. We suggest that not only existing wildlife populations be provided for in the Plan, but allowances should be made for possible increases in wildlife numbers wherever appropriate. This would help alleviate the increased hunting pressure that will be inevitable before too long. Certainly these changes must be accomplished as a reflection of requests from the Wy. Game and Fish Dept.

Comment 59

Forest Service Response

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FPD-59-F-L-E.
Proj. No. Orig. Ltr. No.

Water:

WCSC is pleased to see that a water monitoring program planned on the Shoshone but we are disappointed to see that it has not yet been implemented, DEIS, III-55.

The EPA has recently asked the Forest Service to complete a survey measuring acid deposition in the water on forest lands. We encourage such research and hope that its results contribute to the information sought to make sound management decisions on public lands in the future. The Plan acknowledges the low buffering capacity of the lakes and streams in the Wind River Range. Combined with the data collected in surveying some of these lakes several years ago, it is hoped the monitoring will indicate the effects of acid deposition in these Class I waters. We encourage such research and expect it will be an ongoing process in order to effectively monitor the Wind River Mountains. **52**

59-52 Research has been initiated.

The discussions in Chapters III and IV of the FEIS detail the needs for water data collection referred to in your comment. The Forest recognizes the importance of data in planning its management activities and in maintaining the resources quality according to a variety of standards. The Shoshone Water Resource Monitoring Plan and the Action Plan for Acid Deposition in Wilderness were borne of such data needs. The lack of water data collection efforts in the past is a result of inadequate planning and lack of funding for that purpose. This Forest Plan and its apparent relation to the budget process represents a deliberate effort to reverse this trend and provide for necessary data collection. We are gratified with your concurrence in this area.

It is equally important to operate a regular monitoring program on waters within the rest of the forest. WCSC would like to see the water quality monitoring plan implemented throughout the planning period in hopes of revealing problems of pollution, increased sediment yield or acidification degradation.

The Plan discusses increasing water yield in various ways such as vegetative manipulation (logging); however,"in no alternative is the total increase more than 0.2% of the total production of water from the forest." See CHEC, p. 7. WCSC suggests that not only is the potential gain negligible, but the water would probably be increased at a time when it isn't needed during spring/early summer run-off. Without increased storage facilities, attempts to increase water yield from the forest appear futile. **53**

59-53 We concur. Recognizing the low potential for water yield increase through vegetation treatment, the Forest does not view this as a primary objective. Hence, timber harvests are not designed specifically to maximize water yield, but rather to meet silvicultural, wildlife and visual needs. We maintain that additional water is produced by timber harvests in varying degrees, and that this water maybe used beneficially downstream. Therefore, water yield increases are displayed as an output or effect and are valued.

WCSC suggests that projects planned on the forest be done in an environmentally-sound way and that during the planning period no degradation of water quality is permitted. We consider it very important to maintain the high quality of water for which northwestern Wyoming is known, if we plan to keep the area's fishing streams at their current caliber. We encourage recreational uses of the forest as a clean, renewable resource available to all people. **54**

It is clear that water yield occurring during peak flow times are not beneficial until they are stored or otherwise used at some point downstream. Most increase from the south half of the Shoshone National Forest would be stored in Boysen Reservoir. On the North half, some increases would be stored in Buffalo Bill Reservoir, some in Yellowtail, and others would leave the State via the Clarks Fork River. A number of potential reservoir sites would, if developed, store increases for additional local water uses, lowering losses due to evaporation, groundwater recharge, and pollution that occur in transmission. Recognize too, that water yeilds have intrinsic values while flowing in natural channels.

59-54 We concur. Forest Plan objectives, standards and guidelines, and water resource monitoring activities are intended to serve this purpose.

Comment 59

Forest Service Response

WCSC comment
page 17

FPD - 59 - F - L - E
Proj. No. Orig. ...

Air Quality:

WCSC believes air quality should be a major concern of the Forest Service. Air polution can harm fish, wildlife, forests, other vegetation and significantly affect visitor enjoyment of the forest. Protection of visibility and protection from acid rain should be integrated into the Forest Plan. We are pleased to see that an air quality monitoring plan is being coordinated with the Bridger-Teton N.F. (DEIS, p. III-72.) We agree that "the need has been demonstrated for a long-term program to monitor sensitive receptors for AQRV protection in all Class I areas." This data collection is extremely important in order to have criteria for rejection of potential pollution contributors on the forest. The final goal of air quality protection for the Shoshone N.F. should go beyond attempts to determine and quantify pollution impacts as they occur. The ultimate goal should be to prevent such impacts.

We feel the Forest Service should have clearly defined permit review standards regarding visibility and acid deposition in wilderness areas. We urge the Forest Service to adopt the standards:

1. No measureable increase in acid deposition in wilderness lakes and streams.
2. No visibility impairment perceptable to the human eye; or, no change beyond a 5% change in contrast.

We would reiterate that degradation of air quality is unacceptable and urge the Forest Service to comply with the PSD (Prevention of Significant Deterioration) provisions of the federal Clean Air Act. In addition, we support the Forest Service in recommending against permit applications that would cause undue degradation of air quality.

55

59-55 We share your concerns and agree with the statement regarding visibility and importance of air data. We believe that the Forest Plan addresses all such concerns including those regarding AQRV's, visibility and acid deposition is wilderness. A supplement to the Forest Service Manual (FSM 2120, 11/82, Supplement 17) is referenced in the Plan, blue pages under Air Resource Management. This supplement effectively covers the standards which you urge us to adopt. It is contingent upon the Forest Service to collect appropriate data and enter the PSD permit process at an early stage to assure maintenance of wilderness air quality. Existing manual direction and statements in law are clear on this point.

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Comment 59

Forest Service Response

WCSC comment
page 18

FPD-59-F-4-E
Proj. No. Orig Type Area

Threatened and Endangered Species:

WCSC feels we are fortunate to have an area such as the Shoshone N.F. that provides some of the last vestiges of natural habitat requirements to support various threatened and endangered species. Even more, we feel strongly about enforcement of the Endangered Species Act (ESA) to give these animals priority in management decisions should conflicts arise.

In particular, we are very concerned about the future of the grizzly bear in the Greater Yellowstone Ecosystem. We don't share your optimism, and do not want to seem overly pessimistic, but rather cautious enough to not make any mistakes at this time. We applaud the efforts the Shoshone N.F. and other forests have made to reduce mortalities of the bears during the past few years. This effort must be continued in order that the mortalities caused by humans are reduced even further. We feel that minimizing mortalities of the bears is a major factor in the proposed recovery of the grizzly bear population in the Greater Yellowstone area.

In order to achieve such a goal, we feel it is important to reduce the potential for human/bear encounters and influence the bears' attitude toward independence and away from human food sources. For this reason, we heartily support the Shoshone N.F. for prohibiting oil/gas leasing in Situation I grizzly habitat. Despite the restrictions imposed on resource extractors (logging or oil/gas), we feel that the prohibition could be carried over to Situation II in some cases of recent popular use by the bears. We feel a real problem could arise by allowing logging and roading in grizzly country. During this period when impacts that could deter bear population recovery are ubiquitous, it would seem prudent to take a more cautious approach to allowing resource extraction in prime grizzly habitat. (Note: see comments on grizzly habitat withdrawl under Oil and Gas.)

56

We are concerned that research has shown increased use by the bears in certain areas of the Shoshone N.F. and no change in Situation classification has occurred. This is particularly notable on the North Fork Shoshone. We refer you to the Wyo. Game and Fish Dept. comment.

In essence, WCSC feels that the Shoshone N.F. has set important precedents to aid in the recovery of the bear. We hope this attitude continues. We feel the optimism of the Forest Service about the bears' ability to adapt to human encroachment of already shrunken habitat contradicts a safe and sound approach to encouraging the recovery of the bear, however. We strongly urge the Forest Service to reduce logging, roading, grazing mineral development and recreation in areas of prime grizzly habitat, at least until the bear population has reached a stable level.

59-56 No leasing is permitted in Situation I habitat except for NSO on a case-by-case basis along the exterior 1/2 mile. Situation II areas are protected by stipulations in the "Grizzly Guidelines". In developing the "Guidelines" it was determined that oil and gas activities could be conducted under various restrictions that would not "jeopardize" the continued existance of the bear.

WCSC comment
page 19

FPD 59 F L E
Proj. No. [illegible] Type [illegible]

Monitoring and Evaluation:

WCSC considers monitoring possibly the most important part of the Forest Plan; checking to see if it's working. The monitoring checkpoints listed in the LRMP, p. IV-1 should provide much of the information necessary to look at the effectiveness of the Plan on the ground.

What we don't see in the Monitoring and Evaluation section of the LRMP is a description of what alternatives will be taken should the proposed management not prove positive. Several scenarios can be imagined here:

1. What if silvicultural regeneration is slower than anticipated (80-120 years)? The timber base figures would be automatically thrown off and sustained yield would not occur at proposed cut levels. Would timber harvest be reduced in time to prevent problems?
2. What if demands for certain natural resources on the forest increase more than others? Will renovation of the Plan change emphasis?
3. What if the Wyoming Game and Fish Dept. requests habitat for increased wildlife populations in the future to accomodate the increase in wildlife-related recreation needs?

No mention is made of what action will be taken should the plan not go as expected, except to say that "Significant problems identified in this process may be the basis for initiation of a Management Review." (LRMP, p. IV-2.) We are concerned with such a vague approach to dealing with potential management deviations from the Plan, since the direction decided on at that point could reflect the philosophy of the Forest Supervisor and/or District Rangers primarily instead of the original intent of the Plan.

Furthermore, WCSC has seen no indication that an appropriate budget for such an ambitious monitoring program is available. The summary of Practices, Outputs, and Effects for the First Decade following the individual analysis areas lists very low figures for annual monitoring costs, eg: Wildlife Monitoring -$167, Soil Resource Monitoring - $22, Water Resource Monitoring -$1, Aquatic Habitat Monitoring - $167, and so on. These figures look inadequate to do an effective job of active monitoring that the checklist would indicate. We were unable to find any funds listed for monitoring or range conditions, air quality recreational use, or silvicultural conditions. It is assumed in the Plan that adequate funding for monitoring is available, however, that is not really clear. What if sufficient funds are not appropriated for the monitoring program?

Monitoring will be the strength or weakness of the Plan. It is critical that adequate monitoring funds be spent or there will be poor feedback on the Plan.

57

59-57 We agree that monitoring of Plan implementation is critical and that this feedback loop needs to be provided so that management of the Forest can be adjusted as needed. Such direction is in the regulations governing land and resource management planning (36CFR219). There has recently been much effort given by the Forest Service in general to the subject of monitoring and implementation of Forest Plan. These efforts have resulted in Supplements to the Forest Service Manual. Discussion of the planning regulations has been added to Plan, Chapter IV. As stated in Plan, Chapter IV, details of monitoring are included in the documents incorporated by reference. All such documents are available for review by the public. It is just not possible to incorporate all details of monitoring into Plan, Chapter IV.

Annually, all monitoring activities and implementation of the Plan will be evaluated and appropriate measures taken if deficiencies are noted. When new information is obtained, the significance of that information as it relates to management of the Forest is evaluated. In cases such as these, response will be taken as appropriate ranging from no response, to issuing a Plan amendment, to completely revising the Plan.

The Plan is in essence a "contract with the public" stating that this is how we are going to manage the Forest for the next 10-15 years. One purpose of planning is to reduce the ability of individual civil servants to change the intent of the Plan towards their personal philosophy. It is up to the Forest Service and the public to see that the Plan is followed or changed to meet needs by appropriate processes.

Most of the money spent in monitoring is included in the "program management" for each resource. This includes keeping resource records, evaluation of standards and guidelines to determine adequacy, and carrying out the monitoring as spelled out in Plan, Chapter IV. The money listed for monitoring in Appendix J is slated for monitoring specific projects rather than for a resource program in general.

Comment 60

Forest Service Response

RECEIVED SEP 3 0 1985

FPD - 60 - F - 1 - C
Proj. No. Orig. Type Letter

COMMENT
SHOSHONE FOREST PLAN
SUBMITTED BY: SCOTT BENSON BOX 741 DUBOIS WY. 82513.

I understand there has been a push recently to exclude the special provisions of the wilderness act pertaining to the Glacier addition of the Fitzpatrick wilderness. Specifically the allowances for habitat manipulations to improve Bighorn sheep range and distribution. I like the way the present, proposed plan reads regarding the standards and guidelines for wilderness management involving the Whiskey Mtn. bighorn sheep herd and associated habitats. It is imperative to the well being of this herd that certain habitat manipulations remain available; timber encrauchment, natural plant succession, less desirable plant invasion, and human induced stresses and displacement are a continual threat to this population. ~~To mitigate these concerns~~ Many manipulations and improvements could be expected to be needed in the future, some of which are: fertilization, snowfencing, reseeding, herbicides, trapping/transplanting, baiting, salting, prescribed fire, water development, and slash removal. 1

60-1 We concur. See Management Area 8E in the Forest Plan.

Comment 61

RECEIVED SEP 3 0 1985

FPD - 61 - W - L - B
Proj. No. Orig Type Affil

DR. H. KENT NEUBERT D.D.S.
514 So. Durbin
Casper, Wyoming 82601
(307) 235-5344

Dear Sir;

The Shoshone nat'l forest plan has many shortcomings that I feel would be detrimental to our Wyoming environment. Wyomings greatest asset and resource is its wildlife and wildlands. Therefore I feel the following should be done by the Shoshone nat'l forest:

- Wildlife should be managed to achieve 100% of the population objectives 1
- Conflict between wildlife and other forest uses should be resolved to favor wildlife 2
- No timber sales + roads in Critical Grizzly Bear Habitat 3
- Eliminate roads into roadless areas
- Eliminate roads and timber sales in; Deepkee, Denver Valley, Sawmill Creek, North of Sinks Canyon, lands surrounding Worthen Meadows, Fiddlers Lake to Christmas Lake, and areas surrounding Wilderness areas and Yellowstone Park. 4

I ask you to consider these things

Respectfully

H. Kent Neubert D.D.S.

Forest Service Response

61-1 The intent of the Plan is to meet the objectives.

Population will not be reduced by 37 percent. The Forest only has capacity to provide 63 percent of Wyoming Game and Fish population objective on Shoshone National Forest given the percentage of the total population the Game and Fish assigned the Forest. The present population is at or exceeds Game and Fish objectives; however, a large percentage is on private land.

61-2 On some areas of the Forest when a conflict arises between wildlife and commodity production, wildlife will be favored. On other areas, the commodity production will be favored. The overall objective is to maintain habitat sufficient to support Wyoming Game and Fish herd unit objectives.

61-3 Adequate protection measures for the grizzly are in the Grizzly Bear Guidelines and in Standards and Guidelines. Site-specific projects will be analyzed in accordance with NEPA and the ESA.

61-4 In the 1984 Wyoming Wilderness Act, Congress directed that nonselected roadless areas be released for multiple use purposes, and that "buffer areas" were not to be considered adjacent to Wilderness. With this legal direction in mind, some timber sales and the accompanying roads have been scheduled in roadless areas, while other currently roadless areas have not been scheduled. See also rsponse to comments 182-5 and 44-46.

RECEIVED SEP 3 0 1985

PO Box 780
Livingston Montana 59047
27 September 85

FPD-62-0-L-C
Proj. No. Orig Type Appl

Supervisor Stephen P. Mealey
Shoshone National Forest
PO Box 2140
Cody, Wyoming

Dear Supervisor Mealey:

I am writing to express my concerns about the proposed Shoshone National Forest Plan. I am alarmed by the Plans allowing new road construction in valuable wildlife habitat, as well as oil & gas leasing in these same habitats! 1

I do support the management of the Clark Fork River and the banning of oil & gas development in grizzly habitat. Unfortunately timber sales & roads have not been banned... 2

There is so little untouched wildland left in the continental United States. I hope you will consider the concerns of people who are dedicated to appreciating that wilderness.

Thankyou for your time.

Sincerely,

Monica Schwalbenberg

VI-196

62-1 On some areas of the Forest when a conflict arises between wildlife and commodity production, wildlife will be favored. On other areas, the commodity production will be favored. The overall objective is to maintain habitat sufficient to support Wyoming Game and Fish herd unit objectives.

62-2 Adequate protection measures for the grizzly are in the Grizzly Bear Guidelines and in Standards and Guidelines. Site-specific projects will be analyzed in accordance with NEPA and the ESA.

Comment 63

RECEIVED SEP 30 1985 FDP-63-P-L-C
Proj. No. Orig Type Affil

MRS. MELVIN G. McGEE
1218 SUNSET BOULEVARD
CODY, WYOMING 82414

September 28, 1985

Dear Mr. Mealey.

It is late to be writing you about the proposed Shoshone National Forest plan. So I will be brief.

I believe that Stewardship is a survival value for the human race. Unless each generation is willing to limit its share of resources. it is sentencing the next generation to deprivation. With your Forest Service experience - you are aware that no species distinct its own nest like the human race does. 1

You were great on Report

To Wyoming.

Sincerely -
Harriet McGee

Forest Service Response

63-1 The major purposes and responsibilities of the Forest Service are stated primarily in two Federal Laws, the Multiple Use Sustained Yield Act of 1960 and the National Forest Management Act of 1976. These laws clearly direct the Forest Service to provide, as appropriate, on National Forest System lands for all the multiple uses. Accordingly, the goal of Forest Service planning is to produce plans which provide for multiple use and sustained yield of products and services and, in particular, include coordination of outdoor recreation, range, timber, watershed, wildlife and fish and wilderness (16 U.S.C. 1600) in a way that maximizes long-term net public benefits in an environmentally sound manner (36 CFR 219.1). In short, the primary planning goal requires production of goods and services which assures coordination of resources and maximizes net public benefits.

Wilderness is but one of several multiple use values to be provided on the Shoshone. The suitability of the Forest for wilderness has been evaluated with the result that approximately 57% of the Forest's roughly 2.5 million acres have been designated as wilderness. The most recent wilderness additions occurred in 1984 as a result of the Wyoming Wilderness Act. This act also directed the release of nonselected areas for multiple use management. Forest Plan direction for these released areas as well as other multiple use management areas is to emphasize production of non-commodities while maintaining historic levels of production of commodities. This philosophy was chosen in recognition of the value of the Shoshone to the American public in terms of wildlife; high quality, low density recreation; and outstanding scenic values as well as its role in the Greater Yellowstone area. Production of commodities on the Forest as proposed in the Plan, is done under standards which are designed to enhance non-commodities as much as possible. For example, standards for timber harvests including cut block size, dispersion of cuts, density of roads and timber road management are designed to use commerical timber operations to improve cover to forage ratios for wildlife as well as improve the distribution and amount of structural and vegetative diversity in a way that allows for enhanced recreation access to the Forest when appropriate as well as visual diversity. Because all harvests in the Plan are above cost sales, they provide a mechanism for improving vegetative communities on the Forest, improving wildlife habitat and improving recreational opportunities in a very cost efficient manner. See also response to comment 44-46.

Comment 64

RECEIVED SEP 30 1985

RPD-84-P-L-C
Proj. No. Orig Type Affil

Mrs. DeWitt Dominick
P. O. Box 100
Cody, Wyoming
82414

Sept 27th

Supervisor Stephen Mealey.
Box 2140
Cody, Wyo. 82414

Dear Mr. Mealey.

You are to be congratulated on the third study made for the future of the Shoshone National Forest.

I would like to comment that Timbering should not be allowed in roadless areas. 1

In fact, I am opposed to the 665 miles of new roads planned for the next 50 years. 2

I would like to urge you to eliminate any development that conflicts with wildlife use on critical big game ranges or on grizzley habitat. 3

Sincerely,
"Ree" Dominick (Mrs DeWitt)

Forest Service Response

64-1 In the 1984 Wyoming Wilderness Act, Congress directed that nonselected roadless areas be released for multiple use purposes, and that "buffer areas" were not to be considered adjacent to Wilderness. With this legal direction in mind, some timber sales and the accompanying roads have been scheduled in roadless areas, while other currently roadless areas have not been scheduled. See also rsponse to comments 182-5 and 44-46.

64-2 In response to numerous concerns, the number of acres managed for timber harvest and the resultant amount of roads has been reduced in the final Plan. In the next fifty years, the Plan projects only eighty miles of new road which will be open to the public. There is projected 120 miles of existing road which will be improved and remain open to the public. An additional 150 miles of new road, and 255 miles of reconstructed existing roads are projected to be closed to the public within the 50 year period. Road construction and reconstruction figures have been corrected. See also response to comments 182-5, 33-9, 80-5, and 44-46.

64-3 On some areas of the Forest when a conflict arises between wildlife and commodity production, wildlife will be favored. On other areas, the commodity production will be favored. The overall objective is to maintain habitat sufficient to support Wyoming Game and Fish herd unit objectives.

Adequate protection measures for the grizzly are in the Grizzly Bear Guidelines and in Standards and Guidelines. Site-specific projects will be analyzed in accordance with NEPA and the ESA.

Comment 65

Forest Service Response

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9

Support the Forest's recommendations to:

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Keep the developers out of the Shoshone National Forest areas!

★★ Manage the Clark Fork River to maintain its eligibility for wild and scenic status. 1

★★ Withdraw all wilderness and critical grizzly bear habitat from oil and gas development. 2

Encourage the Shoshone National Forest to:

★★ Manage the Forest with the health of the Greater Yellowstone ecosystem and the preservation of wildlife, recreation, and scenery as the highest priority. Wildlife should be managed to achieve 100% of population objectives. Conflicts between wildlife and other Forest uses should be resolved in favor of wildlife. 3

★★ Eliminate timber sales and roads from critical grizzly bear habitat. 4

Mrs R.A. Sandblom
312 Overlake DR E
Bellevue, Wash.
98004

★★ Eliminate roads into roadless areas.

★★ Eliminate roads and timber sales in the following areas: Deep Lake, Dunoir Valley, Sawmill Creek, North of Sinks Canyon, lands surrounding Worthen Meadows, Fiddlers Lake to Christina Lake, and areas surrounding wilderness areas and Yellowstone National Park. 5

★★ Eliminate any development that conflicts with wildlife use on critical big game range or occupied grizzly bear habitat. 7

★★ Add alternatives which do not assume benefits to wildlife and recreation from increased roads and timber harvest. 8

Mary A. Sandblom

65-1 See response to comment 13-1.

65-2 Wilderness is withdrawn.

65-3 See response to comment 8-5.

65-4 See response to comment 68-6.

65-5 See response to comment 51-5.

65-7 See response to comments 22-5 and 14-5.

65-8 See response to comments 44-1 and 182-5.

Comment 66

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Proj. No. Type Affil

Dubois Outfitters Association

DUBOIS, WYOMING 82513

September 21 1985

Stephen P. Mealey Forest Supervisor
Shoshone National Forest
P O Box 2140
225 West Yellowstone Avenue
Cody Wyoming 82414

Dear Mr Mealey

What follows is an issue by issue breakdown containing comments, criticisms and suggestions concerning the land and Resource Management Plan for the Shoshone National Forest (The Plan) by the Dubois Outfitters Association Because the limitations of time and our own expertise have hindered our making a truly minute and data specific perusal we have elected to treat the broader categories of issues that we feel will not only effect the future of our industry but the general well-being of the forest as well.

Timber - We as outfitters cannot deny the need for some sort of timber management on the forest; we realize its long-term benefits in terms of enhancing wildlife habitat and generally a more healthy forest. Our support for such a process stops when huge tracts of perfectly healthy, green timber are sold off and cut 1

We support a timber management program more in the direction of salvage sales; emphasizing those areas of the forest that are truly diseased and overmature. We believe this approach will most effectively expedite our ultimate goal a truly healthy and long-lasting forest

If green timber is to be sold, we can only support a level that will support the less-wasteful and therefore, more economic mills using our forest. A prime example of such an operation is D.M Wilson Lumber located in Dubois 2

On a specific level we hope that the actual sales proposed through 1994 (Appendix A of the Plan) be re-evaluated and scaled down more in line with our above-mentioned timber management philosophy. That should lower the annual harvest significantly below your projected 11.1 million board feet (MMBF) per year. 1

A final note on timber We feel our district, the Wind River district contributes a disproportionate share of timber to the yearly cut on the forest 4.5 to 5.0 MMBF out of 11.1 MMBF is too much. We feel other districts such as the Clarks Fork should take on a fairer share of the burden

Roads - We will support our district's timber sale policy on a case by case basis only when the following stipulations are met: We demand all new roads (not "most", pg. II87 of the Plan). The more roads closed, the better, according to this Association 5

Trails - We soundly object to the disgraceful condition of our forest's trail system. 6

Forest Service Response

66-1 Timber harvest levels in the final Forest Plan have remained approximately at the level of the proposed Forest Plan. The number of acres proposed for treatment has been reduced. This reduction in acreage reflects less emphasis on steeper, less productive areas (primarily stocked with lodgepole pine) and more emphasis on areas with higher productivity. Harvest levels have been established according to the economic viability of individual areas. Forest standards and guidelines are established which will insure that timber sales will not have adverse effects on wildlife, recreation, water, scenic beauty or other resources.

66-2 As mentioned in other responses, timber harvest levels have been set according to biological and economic factors. When the Forest Service sells timber, the purchaser is determined through competitive bidding processes. See also response to comment 51-5.

66-5 In response to numerous concerns, the number of acres managed for timber harvest and the resultant amount of roads has been reduced in the final Plan. In the next fifty years, the Plan projects only eighty miles of new road which will be open to the public. There is projected 120 miles of existing road which will be improved and remain open to the public. An additional 150 miles of new road, and 255 miles of reconstructed existing roads are projected to be closed to the public within the 50 year period. Road construction and reconstruction figures have been corrected. See also response to comments 182-5, 33-9, 80-5, and 44-46.

Comment 66

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With so much money being spent on logging roads and so very little for maintaining trails (and creating new trails), we feel even a little money diverted to upgrading our trail system could go a long way. 6

Habitat We feel the plan does not fully understand the true dynamics of Big-game life cycles. You mention maintaining winter and summer habitat, but what about those vital corridors that Big-game animals need for traveling from one to the other? The insensitivity to this matter is fully manifested in the Plan by your proposed timber sales in 1990 and 1993 (The "Ramshorn" and "Six Mile Sales). Sales such as these (and others) that will impede, disturb and eventually eliminate wildlife will be fought virtually every step of the way by this Association and its individual members. 7

Grazing This Association cannot at this time support a grazing program that increases cattle A.U.M. allotments. We find it hard to justify even the present level. Our support will come only when those permits are properly administered. That means a program that insists on strict compliance by the permitee, respecting the rights of overlapping outfitter permitees and the general public. This can be achieved by a higher level of Forest Service monitoring and enforcement as well as higher levels of conscious land use by permitted cattlemen. Only then will we have a forest that can truly regenerate forage on a sustained yield basis. 8

Mineral exploration, development, and extraction Realizing the current conditions of the energy market and the apparent lack of potential (e.g. " The North Fork Well") within the forest, we support a more stringent approach to oil and gas ventures. Plainly speaking, we feel both seismic and drilling efforts should be curtailed until such time as the national needs reach a point of true necessity, even crisis. We should not sacrifice our National Forests in order to contribute marginal amounts of oil and gas to an already glutted energy market. 9

Fire Management We as outfitters are well aware of the natural role that fire must play in pristine areas of the forest. Realizing this, we support the plan's proposal to allow naturally caused fire to play a larger role in the forest ecosystem, however, only under certain conditions. Those are: When no grazing permits, outfitter permits, or highly-used public recreation areas or sites are endangered to the point of eliminating that very resource vital to the economic well being or enjoyment of whichever effected party. 10

We appreciate you allowing us this apportunity to comment on and participate in our Forest's planning process. We realize planning is a dynamic process, something to be fine-tuned and re-directed along the way. Hopefully, in the short-term, we have affected some of your proposals. We welcome any opportunity to sit down with you people personally in order to more fully express our views and concerns.

In the long run, we hope to participate in the site-specific developments as they unfold through implementation of the Plan. Once again, thank you for your time

Sincerly yours,

Gary Rice, President
Dubois Outfitters Assoc

Forest Service Response

66-6 The Forest Service recognizes the need for additional emphasis on trail construction and maintenance, and wilderness dispersed camping site reclamation. Implementation of the Plan would provide for this additional emphasis.

Currently, Congress disperses money to the forests by appropriation. This means there are separate monies for trails, roads, dispersed recreation. By law, the Forest Service cannot use money appropriated for one function, to do work in another. Thus, road money cannot be diverted to trail work.

66-7 In the 1984 Wyoming Wilderness Act, Congress directed that nonselected roadless areas be released for multiple use purposes, and that "buffer areas" were not to be considered adjacent to Wilderness. With this in mind, the Wolf Creek timber sale has been included in the Final Forest Plan. Planned sales between Five Mile Creek and the Dunoir Special Management Unit have not been included in the Final Forest Plan; this has been allocated to a 3A prescription rather than a 7E prescription. No logging or roadbuilding will take place in the Dunoir Special Management Unit. See also response to comment 44-46.

66-8 The intent of management on the Shoshone is to obtain strict compliance of standards and guidelines for forage utilization and associated grazing practices for all forage users.

66-9 The General Mining Laws guide what can or cannot be withdrawn from mineral entry and under what conditions. We direct your attention specifically to Plan, Chapter III in the blue pages under Mining Law Compliance and Administration (General Direction 1C and 2) and Minerals Management Oil and Gas and Geothermal (General Direction 1). All direction found under Minerals Management, supplemented by Plan Appendix K, is intended to protect existing and proposed uses of the land for other resources thereby avoiding the need for withdrawal. If exceptional situations arise, or existing direction is shown to be insufficient, the option of withdrawal remains.

Mineral operations are by law, a viable use of public land. Our charter, provided by Congressional action, is to manage first according to law, and not strictly according to variable market pressures. The mining laws stipulate that lease applications can be made and must be considered for lands not withdrawn. The Forest Plan was selected in large part because it allows mineral activities while recognizing and maintaining the values of clean water, stable wildlife populations, and recreation opportunities which are of primary importance to many Forest users. The Forest Plan affords adequate protection of popular recreation areas, critical wildlife habitat, and other such resource values through application of stipulations and recommended operating procedures. Protection may be in the form of seasonal restrictions or no-surface-occupancy stipulations (see Appendix K of the Plan).

One consideration here is that a lease may never result in actual drilling activity; historically, a low percentage of leases are explored or developed, due in part to market fluctuations and uncertainties.

66-10 The importance of fire in its natural role in the ecosystem has been recognized, and the fire suppression guidelines in Appendix F of the Plan has been further liberalized between the proposed and final Forest Plan.

Comment 67

Forest Service Response

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Proj. No. Orig Typo Affil

319 South 20th Street
Worland, WY 82401
September 26, 1985

Stephen P. Mealey, Forest Supervisor
Shoshone National Forest
P.O. Box 2140
225 West Yellowstone Avenue
Cody, Wyoming 82414

Dear Sir:

I wish to submit the following comments for consideration in your final Forest Plan, EIS, and future management.

The Shoshone Forest is an integral part of the Yellowstone Ecosystem, and should be managed accordingly. The Forest should closely coordinate its activities with all the surrounding landowners, since actions taken on the Forest certainly cause impacts to occur on adjacent lands. A case in point would occur when the Forest establishes new access through public land that serves as winter range for elk. Unless the access is closely coordinated with BLM, significant degradation of crucial winter elk habitat could result.

Another example, where the Forest must coordinate its activities, is in the management of grizzly bears and their habitat. The grizzly bear population in the Yellowstone Ecosystem cannot survive under natural conditions within the confines of the Park. The forests, especially the Shoshone, must take further actions to eliminate the effects of man's activities on grizzlies and their habitat. A case in point on the Shoshone, is its lackadaisical attitude with regards to issuing oil and gas leases in grizzly bear habitat. Continuation of existing policies just pounds another nail into the grizzly's coffin. There should be no leasing and/or surface occupancy in any Situation 1 or 2 areas. Also, the lands on the Forest should be changed to their actual classification, so that another abomination like the North Fork Well does not take place and proliferate throughout the Shoshone. 1

67-1 See response to comment 24-1.

No leasing is permitted in Situation I habitat except for NSO on a case-by-case basis along the exterior 1/2 mile. Situation II areas are protected by stipulations in the "Grizzly Guidelines". In developing the "Guidelines" it was determined that oil and gas activities could be conducted under various restrictions that would not "jeopardize" the continued existance of the bear.

Excessive road building and timber cutting seem to be hot topics on most forests due to the continuing influence of old-line timber beasts and engineers in the higher echelon of the Forest Service. I support the proper removal of wood products and other resources from our forest lands, but I also detest the removal when the commodity interests call the shots on how, when, and where they will remove my resources for their personal gain. Allowing such a system to exist is not in the best interest of the public, and is totally contrary to proper multiple use management. Roads should be under a quota system to prevent proliferation of new ones. If a new one is built, equal miles of another should be removed. Deficit timber sales should be only allowed when they are specifically designed to improve watershed and fish and wildlife values. You cannot assume, as the Plan implies, that your 2 3

67-2 Commodity production levels are determined by analytical and political processes and by market economics. See also response to comment 14-3.

Comment 67

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present proposed timber harvest and road building will improve wildlife habitat. This Plan is suppose to be realistic. 3

Livestock grazing is another commodity use that appears to be wagging the dog on the Shoshone Forest. Wetlands (perennial and intermittent streams, springs, and ponds) which represent the most important habitat on the Forest are being pounded the hardest by livestock. It is apparent from your Plan and EIS that the Shoshone Forest has not come to grips with the requirements for properly managing wetlands and floodplains as required under Executive Orders 11990 for Protection of Wetlands and 11988 for Floodplain Management. It is impossible to develop a comprehensive management plan for these valuable resources until all have been systematically inventoried and their condition under present management practices determined. Until this task is completed, which it appears not to have been, and proper management of livestock grazing implemented, the overall trend in wetland habitat condition will continue downward on the Shoshone National Forest. 4

The U.S. Fish and Wildlife Service has developed a wetlands classification system that should be adopted on the Forest. Presently it appears the Forest only recognizes streams supporting trout and/or extensive riparian vegetation as fitting the definition of wetlands. Executive Order 11990 was issued to require proper management of all wetlands on federal lands, not just those selected on a whim by some bureaucrat. A case in point was when writers of the Gold Reef Well Environmental Assessment did not even address impacts to Jack Creek because the reach being impacted, supported limited fish populations and riparian vegetation. Come on, lets take the bull by the horns and at least meet the letter of the Executive Orders and eventually the intent of them. Both were issued because federal agencies had been mismanaging our valuable wetland habitat as sacrafice areas. Most other federal agencies have already adopted the U.S. FWS's classification system.

I wish to congratulate your efforts to keep the Clarks Fork of the Yellowstone River in pristine condition through your management actions. Hopefully someone in authority will recognize we are already oversupplied with irrigated produce and electricity, and take actions to prevent the Clarks Fork from being turned into another pork-barrel project. Like with the Clarks Fork, you must now apply proper management actions to other areas of the Forest to restore and maintain watershed and habitat conditions in perpituity for present and future generations of American citizens. You have been encumbered with the TRUST of the American citizens to wisely manage their lands for all future generations. With foresight, a conservation ethic, and a little backbone you can do your share, as the present land steward, to restore and maintain the integrity of the Shoshone National Forest. 5

Sincerely,

A Shoshone Forest User

Richard L. Kroger

Forest Service Response

67-3 Reef Creek has a considerable number of Elk and Moose - Research has shown that "proper" timber harvest can and does enhance big game habitat.

67-4 We direct your attention to Chapter III of the FEIS. A section has been added under the heading Wetlands and Floodplains. In the introductory portion of that section is a statement quantifying wetland and riparian habitat on the Forest. This quantification is the result of an exhaustive survey of wetlands, lakes and streams on the Forest. We are well into the process of classifying all streams and stream segments using a systematic approach that will facilitate protection and management of riparian areas.

We also direct your attention to Chapter IV of the FEIS, under Wetlands and Floodplains and under the Environmental Effects section of other resources, particularly Range, Wilderness, Minerals and Facilities. We feel that the effects of management in riparian areas, floodplains or wetlands are prominently displayed, albeit not quantitatively.

Because of the potential effects on wetlands and floodplains, as displayed in the EIS, a great deal of management direction was promulgated and prominently displayed in the Forest Plan. This direction incorporates the Executive Orders in question, and it incorporates Forest Service Manual direction (FSM 2520) that relates to all riparian areas, not just trout streams or extensive riparian zones. We urge you to look at the Plan, blue pages, particularly under Wilderness Area Mangement (General Direction 19 through 28), Riparian Area Management, and Water Resource Improvement and Maintenance (General Direction 8). Additionally, please look at Management Prescription 9A in the Plan, yellow pages which is devoted exclusively to management of nonwilderness riparian areas. All such direction is intended for broad application to riparian areas not just "high quality riparian". Unfortunately, the reference in the planning documents to high quality riparian has proved to be confusing. There is no intent to ignore any riparian habitat, wherever or in whatever condition it is found. High quality riparians in the Appendix J context are merely those outstanding or large examples of that ecotype, potentially subject to management activities.

You may be interested in Plan, Appendix G, which is a watershed problem assessment and current listing of project sites stated for improvement. Please note the identification of grazing as a specific problem area, and also note the number of stream (riparian) related projects which we intend to implement.

67-5 The Proposed Plan incorrectly states that we can apply for an extension of the protection period for the River. It is contingent upon an act of Congress to protect the River either by including it in the Wild and Scenic River System or by providing additional temporary protection. It is uncertain at this point whether the Clarks Fork of the Yellowstone River will become a part of the National Wild and Scenic Rivers system. The Forest Service and the Administration are in favor of the River's inclusion. Management activities that are within the discretion of the Forest Service will be designed to maintain the River's eligibility. Other activities that are presently within the discretion of agencies such as BLM (minerals) or Federal Energy Regulatory Commission (hydropower development) could affect eligibility characteristics of the Clarks Fork. In the event such developments are proposed, we would recommend denial to the appropriate agency, until Congress acts. See also response to comment 97-1a.

RECEIVED SEP 3 0 1985

ARCO Oil and Gas Company
Rocky Mountain District
707 17th Street
Mailing address: P.O. Box 5540
Denver, Colorado 80217
Telephone 303 293 4600

FPD - LY - 0 - L - 13
Proj. No. Orig Type A

September 27, 1985

Mr. Stephen P. Mealey
Forest Supervisor
Shoshone National Forest
P.O. Box 2140
Cody, Wyoming 82144

RE: Shoshone National Forest
Proposed Environmental Impact Statement and
Land and Resource Management Plan

Dear Mr. Mealey:

Atlantic Richfield Company appreciates this opportunity to provide the Forest Service with its comments on the subject documents pertaining to the Shoshone National Forest in Wyoming. We recognize the oil and gas potential of the forest and, therefore, are interested in the management of these public lands.

The DEIS begins a discussion of Issues, Concerns, and Opportunities addressed during the planning process (P. I-10). Specifically, on pages I-16 and II-73-78, polarization is discussed, alluding to the fact that some local interest groups are opposed to oil and gas exploration. This discussion, as well as the Social Future section of the Plan itself (pages II-93-94), does not balance numbers of people affected with issue-oriented concerns. Such concerns of groups representing the oil and gas industry appear to have been considered as total numbers, and not in terms of people, jobs, and energy production these companies and trade organizations represent. 1

The NEPA process is not a voting matter; yet, the planning documents rely heavily on local input. Page II-94 states that the management emphasis for the Preferred Alternative "conforms to the attitudes, beliefs and values of the vast majority (emphasis added) of residents ..."

The Forest Service is required to review its issues on a national as well as local level. National issues, such as increased reliance on imported crude and refined petroleum, and the need for increased domestic energy production and reserve replacement, receive little attention in the DEIS and Proposed LRMP. Evidently, local input was the dominant factor in the direction of the proposed plan.

While it may appear on the surface that oil and gas resources were afforded extensive consideration in the draft planning documents, it is obvious that the procedures for dealing with minerals were completed after resource allocation decisions had been made for all alternatives. The fact that the same leaseable acreage is available 2

68-1 The various alternatives were developed through a scoping process that included consultation with a variety of groups, including those affiliated with the oil and gas industry. (See pages VI-1 to VI-6 ofthe chapter). The alternatives were evaluated through a social impact assessment that again included a variety of concerns, including oil and gas. Alternative D, which restrains oil and gas activities to a degree, was most acceptable in terms of resolving social conflicts (See Appendix F of the EIS). It was also among the most acceptable in terms of environmental effects (See Chapter IV of the EIS). In addition, our internal analysis of oil and gas as a valued resource was accomplished using a procedure that had the full support of our correspondents in the oil and gas industry (see Appendix D, EIS, Oil and Gas Valuation). Use of this procedure and how it was going to be displayed as well as a preview of the draft documents were done with regional representatives of this group. Input from this group was relied on as much as any other local, regional or national group.

The NEPA process does not try to determine which comments were more important than others, or determine which issues were emotional and which were fact. It simply takes the issues and develops a series of alternatives to include the issues raised in the EIS process. It is not a voting process. There is considerable polarization because of the many uses and many users of the Forest. Appendix F of the EIS has dealt with the social impact analysis with the framework of the alternatives generated by the scoping process.

68-2 See response to comment 68-5.

Comment 68

Forest Service Response

EPD - 68 - 0 - L - B
Proj. No. Orig Type Affil

Mr. Stephen P. Mealey
September 27, 1985
Page 2

Another indicator that minerals were not treated accordingly is Appendix J. In general, we support the Forest Services' inclusion of Appendecies J and K. We are concerned, however, with some inconsistencies in Appendix J where there is little discussion of mineral resources in some management areas. Specifically, areas not designated wilderness should be discussed in terms of geologic mineral potential and access. 3

There is no evidence that the Forest Plan complies with National Forest Management Act regulations (36 CFR 219.12j) which are documented in Appendix D (page 41) of the proposed EIS. The Forest Service has the necessary information to make trade-off decisions between surface and subsurface resources, but this information was not used for trade-off purposes. Rather it appears to have been utilized to determine how and where the oil and gas industry should be constrained in order to avoid any possible conflicts between surface and subsurface resource values. 5

It is interesting to note that Forest Supervisor, Mr. Steve Mealey, has stated on numerous occasions that oil and gas activities are wanted and needed in the Forest. This philosophy is contrary to that reflected in the proposed plan. Apparently, oil and gas activities are welcome in the Shoshone National Forest to the extent they have absolutely no affect on surface resource values, regardless of mineral potential.

On a more practical level, there is no indication in the plan where travel corridors occur or where roads will be allowed on the Forest. The Travel Management discussion addresses, in graph form (DEIS Figure III-4), the percentage of road closure, but does not indicate where they occur. This is especially important in light of the Plan's direction for "isolated "tracts" where oil and gas leases are located.

The documents are permeated with the idea that helicopter mobilization is the answer to "isolated tracts" (apparently away from current or planned roads). In many instances helicopter mobilization, although an alternative which merits consideration, is not feasible because of altitude. Other circumstances to consider are the availability of helicopters capable of moving drilling equipment, availability of drilling rigs which are helicopter portable, and the economics of helicopter mobilization. Although helicopter mobilization was utilized in one instance as an experimental approach -- the only time in the Rocky Mountains -- it is being proposed as the cure-all for oil and gas exploration on the Shoshone National Forest. In prescribing this extremely severe restriction on almost every unroaded acre of the Forest, it is evident that the Forest Service has in no way complied with the IBLA mandates to consider less restrictive alternatives prior to deciding to impose severely constraining stipulations on oil and gas leases. 6

BLM Instruction Memorandum 84-415 states on page 2 that "the IBLA has upheld the Bureau's use of stipulations only when the record contains

68-3 Additional information has been added to Appendix J relative to minerals in nonwilderness areas.

68-5 The intent of the Forest Plan is to provide opportunities for oil and gas exploration and development wherever legally possible with controls on operations designed to make these activities compatible with other resource objectives. Resource coordination requirements affect all resource management programs, not just minerals activities. All activities are managed so as not to violate the standards and requirements of the other resources. The Forest Service cannot rely on a perceived willingness by operators or contractors to meet various requirements. All requirements must be a part of the "contractual package", be it a permit to drill or a timber sale contract or whatever. The process described in the Errata Sheet to Appendix K of the Proposed Plan (which has been incorporated into Appendix K of the Forest Plan) describes the process by which requirements for specific leases or operations will be determined. This process includes site-specific environmental analysis and documentation.

The Multiple-Use Sustained Yield Act states:

> " ... nothing herein shall be construed as to affect the use or administration of the mineral resources of National Forest Lands ...".

The Minerals Leasing Act states:

> " ... 5. The Chief of the Forest Service must issue regulations or impose stipulations that include (a) requirements for restoration revegetation or curtailment of erosion of the surface of the land; (b) requirements to ensure that activities in connection with the rights-of-way or permits will not violate applicable air and water quality standards nor related facility siting standards established by or pursuant to law; (c) requirements designed to control or prevent damage to the environment, including damage to fish and wildlife habitat, damage to private or public property, hazards to public health or safety; and (d) requirements to protect the interests of individuals living in the general area of the right-of-way or permit who rely on the fish, wildlife, and biotic resources of the area for subsistence purposes. The regulations must apply to every right-of-way or permit granted under this section and may apply retroactively. 30 U.S.C. 185(h)(2)".

And further:

> " ... 10. Section 185 does not amend, repeal, modify, or change the requirements for an environmental impact statement or any other provision in NEPA (p. 147). Id.(h)(I)".

FPD-68-0-1-B
Proj. No. Orig Typo Attn

Mr. Stephen P. Mealey
September 27, 1985
Page 3

sufficient justification and indicates that less restrictive stipulations were considered but rejected as not serving to adequately protect the public interest." There is no indication in the proposed documents that the Forest Service considered less restrictive alternatives. While the Forest Service may not be formally bound by IBLA decisions, BLM is. BLM has the responsibility of justifying stipulations recommended by the Forest Service. 6

We believe it is essential, at minimum, that a qualifying statement be included in appropriate sections of the Plan, including Appendix J, which says these requirements can be waived if it is found that helicopter access or mobilization is infeasible or not justified in terms of environmental benefits gained when viewed in light of increased costs to the operator, or that it would be possible to use motorized means.

In addition, the Proposed Plan stipulates that Grizzly Bear Situation 1 Habitat be recommended for lease denial. It is evident that oil and gas leasing is the only opportunity that is denied outright. While other activities must conform to the "1979 Grizzly Bear Guidelines" and the Endangered Species Act, there are no other prohibitions such as no leasing for oil and gas in Situation 1 Habitat. In fact, the Forest Service feels that other disturbance related activities, such as timber clearcuts and thinning, do not represent a threat to the grizzly population or recovery plans. Yet many of these activities would have an effect of greater magnitude than small exploratory operations. It is obvious that the Forest Service has chosen to single out the oil and gas industry in its decision not to lease in these areas. This no-lease decision constitutes a withdrawal under FLPMA and the Forest Service must either comply with the reporting requirements of Section 204 or modify its recommendations. 8

It is evident from the foregoing that Atlantic Richfield Company is very concerned with the proposed EIS and LRMP's treatment of oil and gas. Should you care to discuss these comments, please do not hesitate to contact me at (303) 293-7138.

Sincerely,

Dean A. Moses
Public Lands Coordinator

DAM/das

VI-206

68-5 (continued) The point here of citing the above references is to demonstrate that the management of surface resources and subsurface resources fall under many laws. It is not appropriate to cite a single law and determine that an action is illegal or discriminatory without reviewing the full array of laws that apply to the situation.

Area available for leasing in all alternatives is 934,990 acres or 38 percent of the Forest. With one exception, this represents the maximum acreage legally available considering the areas withdrawn such as wilderness, research natural areas, and administrative sites. The exception is the majority of Grizzly Bear Situation I lands outside wilderness. The decision to recommend lease denial in Situation I is supported by two environmental analysis documents. In both cases, there were no public comments on these documents which opposed this decision. Further, the decision was support by the U.S. Fish and Wildlife Service in their formal opinions written for these documents (see response to comment 68-8). The U.S. Fish and Wildlife Service recently issued a "no jeopardy opinion" on the Forest Plan. This opinion was partially based on lease denial on Situation I lands.

Within the land classified as available for leasing, there are areas designed by the Plan for no-surface-occupancy (NSO). The oil and gas industry views these areas as effectively closed to leasing due to the cost of air access. The areas of NSO are the estimate of those lands which are highly susceptible to long-term impacts from oil and gas development. The environmental analysis process described in Forest Plan, Appendix K will be used to redefine NSO based on site-specific data so as to minimize "lost opportunity to discover". The industry cannot contest the principle of restrictions on operations based on protection of surface resources. It could take exception to Forest Service data, data interpretation, and prediction of effects. There were no comments questioning Forest Service data or its use. See response to comment 68-6 for a discussion of travel corridors and isolated tracts.

Recognizing the importance of oil and gas development as a local, regional and national concern; executive orders dealing with energy self-sufficiency; and considering the laws governing mineral leasing; all acres which could be made available for leasing were made available in all alterantives. In this way, the national importance of oil and gas was explicity included. Further, RMOGA suggested withdrawl of some areas from oil and gas operations as a way to deal with trade-offs. This strategy was rejected by the Forest Service. It was felt that because of legal mandates and because of the benefits of oil and gas activities that the Forest Service should allow leasing and development wherever possible on the Forest and search for ways to make such operations compatible with management of other resources (per the intent of each alternative).

Because acres available did not change by alternative while the intent of each alternative was different, there was a need to treat oil and gas operations differently by alternative. This was needed to bring such operations into compliance with the intent of each alterantive as well as provide a basis for estimating and displaying trade-offs between oil and gas operations and other resources. The mechanism chosen for this was by varying the stipulations and operating standards that will probably be recommended for such operations. All alternatives meet legal minimums in terms of protecting soil and water resources as discussed in the DEIS. However, alternatives vary in terms of stipulations and operating standards related to visuals, wildlife, and recreation. Estimates of these effects on other

Comment 68

68-5 (continued) resources were included in analysis as displayed and discussed in Chapters II and IV of the DEIS. Further, the increased cost of oil and gas operations due to stipulations and operating standards were represented by decreases in lease bid values as depicted in PNV displays in Appendix D. In this way, a full range of alternatives in terms of how those 934,990 acres would be leased is represented in the plan alternatives. Using information developed and presented in Chapters II and IV as well as Appendix D to the EIS, trade-offs were displayed and used in selection of the preferred alternative.

Given these factors, it cannot be said that oil and gas resources were not included in tradeoff analysis or in development of alternatives. They were very definitely included and not "after the fact". Neither can it be said that the local input of special interest groups was used as a substitute for the processes prescribed by the National Environmental Policy Act (see Appendix B of the EIS for details in analysis procedures).

In regard to analysis of the tradeoff between wilderness and oil and gas development, NEPA and its implementing regulations do provide for analysis of alternatives which violate existing law as stated by the commenters. This is generally in application of a general law to a specific area where the benefits and costs of that application have not been considered by decision makers. This is not the case in terms of designated wilderness areas. Each area designated as wilderness was done so on an area by area basis by Congress. They determined, for those areas being designated as wilderness, that there was sufficient information upon which to base a decision and that decision was to designate those areas as parts of the National Wilderness System. This is evidenced by the fact that in cases where they felt there was insufficient information on which to base their decisions, they would designate such areas as "study areas" for which they requested further analysis and information. Two such areas are designated on the Forest (the Dunoir Special Management Unit and the Beartooth High Lakes Study Area). During scoping for Forest Planning nationally, regionally and locally, it did not appear appropriate to second guess Congress on their intent. Therefore, it was decided that such analysis was inappropriate unless requested by Congress. Such a request has not been received. Because of these reasons, analysis of opportunity costs of existing wilderness areas was not done.

68-6 Isolated occupancy tracts are areas on the Forest where the soil and landform conditions can withstand normal oil and gas operations without exceeding minimum standards of soil and water resources, but which appear to be inaccessible. They are, in effect, islands where there is no reason torestrict surface occupancy on that particular area, but where there does not appear to be a way to construct a road to that area and still protect soil and water resources. If an area that is suitable for surface occupancy lies adjacent to other such areas and together they form a corridor to an existing road, then it was not considered an isolated tract. This is true even if there is no road in that corridor presently and regardless of the number of miles of new road construction necessary to connect that area to an existing road. In short, isolated tracks are areas where building a road to them using standard technology would violate soil and water minimums. If a road can be built to it, it is not "isolated".

Forest Service Response

68-6 (continued) The Errata Sheet to Appendix K of the Proposed Plan (which has been incorporated into Appendix K of the Forest Plan) describes how site specific environmental analysis fits into the leasing, exploration, development process. The process outlined calls for a site-specific examination of NSO areas to see if, in the context of a specific proposal, they are truly isolated. This process will be used to minimize any "lost opportunity to discover" by looking at ways to explore or develop without violating other resource standards. The discussion on isolated tracts in Appendix K has been modified to increase clarity.

The concern over isolated tracts has caused a wave of "helicopter paranoia". If after a site-specific analysis, the area is truly isolated, then helicopter access is presently the only means to access. Even given the helicopter's tremendous expense, it may very well be cheaper than conventional road construction and subsequent obliteration provided that a road could be constructed without violating soil and water standards. In fact, Willie Legg of Marathon Oil, indicated that the helicopter show on the North Fork may have been cheaper than roading from an exploration standpoint. The fact that there are presently few rigs available that can be mobilized by helicopter would indicate that the current cost may be artifically high. If a demand is demonstrated, additional supplies of these portable rigs will probably bring the cost down.

Direction for individual Management Areas contains standards and guidelines dealing with transportation systems.

68-8 The decision to recommend lease denial in Situation I is supported by two environmental analysis documents. In both cases, there were no public comments on these documents which opposed this decision. These documents are the DEIS for Oil and Gas Exploration and Leasing within the Washakie Wilderness and the 1982 Environmental Assessment of Oil and Gas Operations in Grizzly Bear Situation I and II. Further, the decision was supported by the U.S. Fish and Wildlife Service in their formal opinions written for these documents. The U.S. Fish and Wildlife Service recently issued a "no jeopardy opinion" on the Forest Plan. This opinion was partially based on lease denial on Situation I lands.

The decision in the Plan does not constitute a withdrawal for it is a temporary ban on leasing. If Situation I lands were withdrawn, leasing following recovery of the bear would require negation of the withdrawal.

The Plan selected the option of requiring no-lease as opposed to withdrawal because in the event of a recovered grizzly bear population, leasing would again be considered. Further, the cumulative effects studies currently underway might help us understand ways in which oil and gas activities may be accomplished with no effect on the Grizzly. Once the cumulative effects can be predicted, then the Interagency Coordinator Committee could consider the general opening of Grizzly Situations I to leasing and formally consult with U.S. Fish and Wildlife Service.

There are many other resource restrictions in Grizzly Bear Situation I habitat. Timber and grazing operations as well as recreational opportunities are limited in these areas.

Comment 69

RECEIVED SEP 3 0 1985

Belfry, Montana
Sept 22, 1985

FPD-19-0-L-C
Proj. No. Orig. Type Affil

Dear Mr Mealey,

I have heard of some plans to put timber roads through some of the remote sections of the Mountains in the Table Mountain area. I wish to protest these plans as they will also be used by hunters and backpackers and anyone else who chooses to use them. 1

I have a place on "Little Rocky Creek" in the Clark area of Wyoming and I know what people do to people's personal property. Not a large persentage of people, but one never knows which ones can be trusted. Some people in the past have

Forest Service Response

69-1 Further economic analysis has shown that timber activity from the Table Mountain area during the first decade would not be viable; therefore, all timber harvest has been removed from the first decade schedule. The Plan has been revised to reflect this change.

dug our potatoes, caught & butchered our chickens, milked our cow and picked our apples while "fishing" in our Creek.

I am a taxpayer in Wyoming, and protest these roads being put in these areas.

Sincerely
Hazel Cockrane,

VI-209

RECEIVED
SUPERINTENDENT'S OFFICE
Sep 30 11 45 AM '85
U.S. FOREST SERVICE
BIGHORN NATIONAL FOREST
CODY, WYOMING

Comment 70

Forest Service Response

RECEIVED OCT 1 1985

FPD-70-P-1-C
Proj. No. Orig Type Affil

Dan Estes
Box 926
Russell Creek
Cody, WY 8241

October 1, 1985

Steve Mealey, Supervisor
U. S. Forest Service
West Strip
Cody, WY 82414

Dear Mr. Mealey:

We have the following comments to make on the Forest Plan.

1 Due to the access and all roads that would have to be built, we think Table Mountain is an impractical area for a timber sale.

2 The existing timber sale on Lodgepole and the proposed Oliver Gulch/Cathedral Cliffs sale will not leave adequate coverage for elk migrating out -- that's a major route for them. Steepness of the terrain in Oliver Gulch makes it impractical for logging - there will surely be much erosion.

3 Regarding the timber sale for Russell Creek - there would have to be too many roads built -- this is critical winter elk range area -- the roads will add to loss of shelter areas.

4 We oppose the great increase in number of roads to be built. There are enough roads in the area and it doesn't make sense to build more when you're proposing to close already-existing roads such as Lodgepole and Camp Creek.

5 We feel there has not been enough forest set aside for wildlife -- too much emphasis is placed on domestic stock. The Ghost Creek allotment has no allowances made for critical elk habitat - Rocky Ford should be designated as critical elk habitat and no cattle should be allowed in that area. Over the nine years we have lived up here, we've noticed a great decrease in number of elk that winter on Rocky Ford and attribute that to overgrazing by cattle. Cattle were allowed to graze in this area this summer -- they weren't supposed to be in here at all yet were allowed to be for approximately one and a half months.

6 We feel the lower Russell Creek and upper Russell Creek Basin livestock numbers should be cut back due to number of elk that winter in there.

7 We feel there's a need for more developed campgrounds on the Beartooths. The two existing open ones are always full and with the population of elderly (55 and over) in this country increasing to nearly half the total population, there will be an increase in demand for "retirement-age type" camping, i.e. trailers and campground use.

VI-210

70-1 Further economic analysis has shown that timber activity from the Table Mountain area during the first decade would not be viable; therefore, all timber harvest has been removed from the first decade schedule. The Plan has been revised to reflect this change.

70-2 Design of all timber sales will consider migration routes and will be designed to provide adequate hiding and escape cover.

All timber sales on the district will be on slopes of less than 40% and mitgation measures will be employed to protect aginst erosion.

70-3 Roads in crucial elk winter range will be seasonally controlled to protect the wintering populations.

70-4 We have tried to provide a mix of motorized and nonmotorized access to water attractions. The overwhelming demand is to limit the number of lakes accessible by vehicles.

70-5 CPWR (See Game and Fish letter 97-40) Analysis indicates adequate forage for both elk and cattle. Elk winter range within Moose winter range and text will be corrected. See also response to comment 44-28.

70-6 See response to comment 52-1. Consideration for wildlife winter range by herd unit was included in formulation of the Plan. Based on Wyoming Game and Fish Department population targets established in 1985, there is sufficient forage in that area to support the cattle indicated for the Basin allotment as well as meet these herd unit targets.

70-7 A campground is scheduled for construction at Lily Lake in the second decade.

Comment 70

FPD - 70 - P - L - C
Proj. No. Orig Type Affil

Forest Service, page 2.

The ever-increasing popularity of ATV's and increased use of them on the Beartooths make us think there should be more areas set aside for their use. Maybe by setting aside specific areas for them would cut down on the increase in misuse and violations by these users on the forest. Give them someplace legal to ride and maybe they'll use it. **8**

The Forest Service seems to have hundreds or thousands of rules and regulations, but they are very lax in enforcing any of them (or lax in keeping a sufficient number of employees to do the enforcing). More emphasis should be placed on enforcement and education of the public. **9**

In general, the plan is too complicated to apprehend and make heads or tails of. The money for this study was misspent to have produced a product like this. This sort of bureaucratic nonsense is why the government is so "screwed up". This should have been written and assembled in a more easily interpreted manner. Was it done this way to discourage anyone from commenting? Even some Forest Service personnel we have talked with admit to difficulty in understanding and/or explaining parts of this plan. **10**

Once this plan has been "passed" - can anything be changed or altered or public hearings held if something comes up? If so, what is the determining factor and who decides if public input will be sought? **11**

Sincerely,

Dan and Carole Estes

Forest Service Response

70-8 The use of vehicles for off-road travel is sometimes appropriate for National Forest lands and sometimes not. Many trails are open to vehicles less than 40" in width. No trails and no areas are open to off-road use of vehicles of greater width. Such restrictions are necessary because of steep slopes, fragile soils and vegetation, and conflicts with other users.

70-9 More emphasis has been placed on enforcement of the various laws, rules, and regulations pertaining to the use of the national forests in recent years compared to as little as 5 years ago. Current (1985) conditions on the Shoshone National Forest reveal that:

- nearly all field-going, permanent employees have received law enforcement training (called Level II) which qualify them to enforce the rules and regulations in Titles 18 and 36 of the Code of Federal Regulations.
- approximately twenty temporary employees are trained each year to assist with enforcement during the field season.
- a zone law enforcement specialist, a Special Agent with the full range of law enforcement authorities, is stationed in Cody.
- the Forest maintains at least one permanent employee with Level IV training. This is one step below a Special Agent.
- the Forest has a designated law enforcement coordinator to coordinate and direct law enforcement activities.

Forest Service policy places prevention and education before enforcement. Towards this end, numerous pamphlets and public information items have been developed and are in use.

70-10 We did our best to organize the Plan to help readers. The tables of contents are fairly complete. The DEIS introduction (Chapter I) summarizes the planning process. Close attention to pages I-1 through I-7 should prove helpful. The introduction to the Plan, (Chapter I) is very brief and concise. We issued a summary document to condense the material for readers who did not want to investigate too deeply. Given the magnitude and complexity of determining a targeted course of action for the Forest for the next ten years, we do not see how we could have done a whole lot more to clarify the documents. See also response to comment 96-1.

70-11 As stated in the Proposed Plan errata sheet for Chapter III, site-specific environmental analysis will be carried out before implementation of any project including those listed in the Plan. The first step is scoping which may or may not include solicitation of public input. The responsible line officer decides, based on information provided to him by his staff, if scoping is to involve solicitation of public input. The text of the errata sheet has been included in the Plan.

Once the plan is final, it respresents a "contract" with the public about how we intend to manage the Forest. As the Plan is implemented, there will be needs to change it. This is due to a variety of reasons such as inaccurate data, budget problems, or changes in the situation like new demands for developed recreation. The public will be notified about all changes on a continuing basis. Such changes can take one of

three forms, an amendment to the Plan due to such things as minor problems in data or budgets; amendments which will cause major shifts in management in a localized area; and revisions that cause major shifts in management of the entire Forest. The first of these three will probably be handled merely as public notifications. The second and third type of change will require an environmental impact statement; which means that the public will be notified early that a change is anticipated, public comment will be solicited on the change, alternatives to current direction will be formulated, analyzed and shared with the public for their comment before a decision is made.

The intent is to make the Plan a realistic management tool which is responsive to acquisition of better data and changing situations.

Also see response to comment 44-55.

Comment 71

RECEIVED OCT 1 1985

LM - 2 - P - 1 - C
Proj. / Ps. / Orig. / Type / Agcy

September 28 1985

Supervisor Stephen P. Mealey:

My name is Jerry French, 34 year Lifetime resident of Park County. I would like to see the following things done for our Shoshone National Forest.

* Keep new roads out of of currently roadless areas. **1**

* Manage forest in favor of Wildlife. Grazing of cattle should be dropped to save grass for wintering Elk. **2**

* Eliminate any development or activity that conflicts with wildlife use on critical big game range or grizzly bear habitat. **3**

* Manage Forest for beauty + recreation not for over grazing by Cattle, oil + gas developement and Timber Harvest. **4**

* Work for Forest access on existing roads that have no access rights. **5**

back side

Forest Service Response

71-1 In the 1984 Wyoming Wilderness Act, Congress directed that nonselected roadless areas be released for multiple use purposes, and that "buffer areas" were not to be considered adjacent to Wilderness. With this legal direction in mind, some timber sales and the accompanying roads have been scheduled in roadless areas, while other currently roadless areas have not been scheduled. See also rsponse to comments 182-5 and 44-46.

71-2 On some areas of the Forest when a conflict arises between wildlife and commodity production, wildlife will be favored. On other areas, the commodity production will be favored. The overall objective is to maintain habitat sufficient to support Wyoming Game and Fish herd unit objectives.

71-3 Developments not compatible with crucial big game winter range will not be allowed.

It is recognized that disturbance activities such as timber sales can displace grizzly bears and potentially increase the risk of bear mortalities. Mitigation measures such as provisions for adjacent security areas and stringent controls on timing and administration of activities will be incorporated as necessary in timber sales. As indicated, logging can improve the quality and quantity of bear foods.

71-4 Based on all analysis, the Forest Service believes that Alternative D presents a more balanced mix of Forest uses than Alternative C. Alternative D as a whole responds better to the issues and concerns identified.

71-5 Forest Right-of-Way needs are identified in the Forest Plan.

Comment 71

I also support the Forest's recommendations to.

xx Manage the Clarks Fork river to maintain its eligibility for wild and scenic status.

xx Withdraw all wilderness and critical grizzly bear habitat from oil + gas development.

Sincerely

Jerry L. French

Jerry L. French
1851 Lane 10 HC73
Powell, Wyo. 82435

VI-214

Comment 72

RECEIVED OCT 1 1985 FPD-72-W-L-C
Proj. No. Orig Type Affil

Shoshone National Forest

Dear Sir.

I would like to comment on your forest plans

I have been up on the beartooth fishing, and there is a lot of timber that is mature and some with the pine beetly and that needs cut. 1

I would like to see the Morrison trail road extended from where the Park County stops on thru to the Highway around sun light basin. This would help the log haulers also, but we need a way into the sunlight area and up on the beartooth lakes with out the trip up + down dead indian as that road down into the basin is the roughest steach around. I see people from out of state go up to Red Lodge 2

VI-215

Forest Service Response

72-1 Analysis indicates timber on the Beartooth should not be harvested in the first decade. A considerable portion of the suitable timber is scheduled for the second and third decade.

72-2 An EIS was prepared in the early 70's with public meetings locally and the "Canyon Route" was one of the alternatives analyzed. It was not the selected route however.

FPD-72-W-L-C
Proj. No. Orig Type Affil

to keep from going back up that hill.

We need all the oil & gas that we can get here in the U.S.A. 3

We also need more roads to more of the lakes like Deep lake & Granit lake. as the time the people can be up on that plate is short and that belong to all of the people not just the young and those that have horses 4

I think you people are doing a very good job.

Thanks

Respectfully

Jackie L Jackanicz
P.O. Box 264
Byron Wy 82412

72-3 Mineral operations are by law a viable use of public land. Our charter provided by Congressional Action is to manage according to law and not variable market pressures. Oil and gas activity on the forest however is subject to market trends.

72-4 We have tried to provide a mix of motorized and nonmotorized access to water attractions. The overwhelming demand is to limit the number of lakes accessible by vehicles.

Comment 73

Forest Service Response

RECEIVED OCT 1 1985

FPD-73-F-L-G
Proj. No. Orig Typo Affil

CITY OF LANDER, WYOMING

OFFICE OF THE MAYOR

September 26, 1985

Forest Supervisor
Shoshone National Forest
P. O. Box 2140
Cody, Wyoming 82414

Dear Sir:

This letter is in regard to the proposed ten year forest plan developed by the United States Forest Service concerning the Shoshone National Forest. The plan in its present form calls for approximately 260M board feet of sales in the Lander area per year.

The sales program proposed by the Lander District Office staff calls for a sales program of approximately 1,000M board feet per year over the next ten years. This expended program would create additional jobs for the Lander area.

An expanded program would also help clean up many stands of timber that are dead or dying from Mountain Pine Beetle infestations. Because of the high recreation use of the area the beetle infested stands could be a significant fire hazard and jeopardize the public health, safety and welfare.

Due to the depressed economic conditions of the Lander area and the poor conditions of the timber stands in the South Pass area please consider supporting an expanded timber sale program in the Lander District of the Shoshone Naticnal Forest.

Should you have any questions please feel free to contact me.

Sincerely,

Del McOmie
Mayor

DM/lr

Where Rails End and Trails Begin

VI-217

73-1 Based on public comment, and the need to manage timber stands on the Lander District, the Plan will be changed to reflect a harvest if one million board feet of timber. This will consist of 50% dead and 50% live. See also response to comment 80-2.

Comment 74

RECEIVED OCT 1 1985

Larry E. Cheeney
235 Canyon
Lander, Wy. 82520

IPD-74-F-P-C
Proj No. Orig Type Affil

Wyoming Wildlife Federation
P O Box 106
Cheyenne, Wy. 82003

Supervisor Stephen P. Mealey
Shoshoni National Forest POB 2140
Cody, Wy. 82414

Re: Shoshoni National Forest Plan

To whom it may concern:

Upon receipt of your brochure regarding the Shoshoni National Forest plans as set forth by the seven groups listed I want to go on record as being against most of their ideas as it seems to me that they are acting upon surmise and not the real problem.

We do not like to see the country destroyed but we do need access roads to harvest timber, oil drilling and water development. These are the very life sustaining necessities for the human race.

I cannot see why we cannot use discretion and still maintain and preserve our forests and wildlife.

We the undersigned:

Name	address
John Rossi	235 Canyon Lander Wy.
Eleanor Cheeney	235 Canyon Lander Wy.
Larry E Cheeney	235 Canyon Lander Wy
[illegible]	791 [illegible] Lander Wyo
Arline [illegible]	531 S 3rd St. Lander Wyo.
Blaine B. Bray	512 So. 3rd Lander, Wyo.
[illegible]	Box 391 Hudson, Wy. 82515
[illegible]	1025 [illegible] Ct Lander Wyo 82520
E. J. Pugh	792 [illegible] Lander, Wyo.
Eileen O'Laughlin	Box 532, 590 Mkt Lander Wy 82520
Marian G. Irving	560 Sweetwater Lander Wy 82520
Daniel A. McOmie	373 Washakie Lander, Wy 82520
[illegible] J. McOmie	214 Sweetwater Lander 82520
Mary Lane	P.O. Box 17 Lander, Wyo. 82520
Patricia Ashley	Hudson, Wy
Jim Stanley	Lander Wyo.
[illegible]	Lander Wyo
[illegible]	696 Canyon Lander Wyo. 82520
[illegible] Smith	985 Riverview Dr. Lander Wyo 82520
[illegible]	55 Calumet Lane
[illegible]	Lander, Wyo.

Forest Service Response

No response necessary

Comment 74

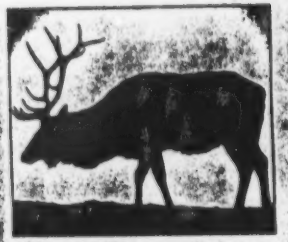
Forest Service Response

FPD-74-F-S-C RECEIVED OCT 1 1985

Proj. No. Orig Type Addl

THIS IS YOUR CHANCE TO HELP PROTECT THE WILDLIFE AND WILDLANDS OF THE SHOSHONE NATIONAL FOREST.

The comment period for the proposed Shoshone National Forest plan ends Thursday, October 3rd.



MAJOR FEATURES OF THE PLAN INCLUDE:

★★★ A failure to address the cumulative impacts the proposed activities will have on the Greater Yellowstone ecosystem. NO

★★★ An increase in the Forest's annual timber harvest of 10% over current levels. Over 101,000 acres are listed as suitable for timber harvest, including many roadless areas. YES

★★★ 665 miles of new roads will be constructed in the next 50 years. Much of this construction is planned in roadless areas, wildlife habitat, and elk migration routes. YES

★★ All lands that are not designated wilderness or critical grizzly bear habitat are open to oil and gas leasing. This includes land surrounding the Washakie, North Absaroka, and Absaroka-Beartooth wilderness areas. NO YES

★★ An inadequate range of alternatives from which to compare management options. All alternatives assume that wildlife and recreation will benefit from timber harvest and road construction. moderate YES

Support the Forest's recommendations to:

★★★ Manage the Clark Fork River to maintain its eligibility for wild and scenic status. YES

★★ Withdraw all wilderness and critical grizzly bear habitat from oil and gas development. NO

Encourage the Shoshone National Forest to:

★★ Manage the Forest with the health of the Greater Yellowstone ecosystem and the preservation of wildlife, recreation, and scenery as the highest priority. Wildlife should be managed to achieve 100% of population objectives. Conflicts between wildlife and other Forest uses should be resolved in favor of wildlife. NO conservatively

★★★ Eliminate timber sales and roads from critical grizzly bear habitat. NO

★★ Eliminate roads into roadless areas. NO

★★ Eliminate roads and timber sales in the following areas: Deep Lake, Dunoir Valley, Sawmill Creek, North of Sinks Canyon, lands surrounding Worthen Meadows, Fiddlers Lake to Christina Lake, and areas surrounding wilderness areas and Yellowstone National Park. NO

★★ Eliminate any development that conflicts with wildlife use on critical big game range or occupied grizzly bear habitat. NO

★★ Add alternatives which do not assume benefits to wildlife and recreation from increased roads and timber harvest. NA / LOW

No response necessary

FPD - 75 - F - 1 - C
Proj. No. Orig Type Appl

RECEIVED
SHO ON NATIONAL FOREST
OCT 1
U.S. FOREST SERVICE
CODY, WYOMING

840 Kimberly Ct.
Lander, WY 82520
September 29, 1985

Mr. Stephen P. Mealey
Supervisor, Shoshone National Forest
Box 2140
Cody, WY 82414

Dear Mr. Mealey:

I wish to take this opportunity to comment on the proposed Shoshone National Forest draft plan.

As one who has lived near the forest for the greater part of his adult life, I have more than a passing interest. I think it must have been about 1930-1932 when my father first took me with him to bring posts, poles and fire wood, by team and wagon, from the forest above Lander to the family ranch. Before backpacking became popular, I slung a bedroll and a rucksack with some food on my back, hiked from the foot of the mountain, and went into the mountain fastnesses - alone. Later, I went on hiking-horse pack, and horseback trips through much of the southern end of the Wind Rivers. I worked on a forest trail crew immediatley after World War II, and later as a summer fire guard at Double Cabin north of Dubois. (It is now painful to return to the what was once beautiful Double Cabin area and see the gutted forest, thanks to indiscriminate and insensitive timber planning and practicing.)

The forest has seen enough insensitivity. Instead of planning for an increase in timbering, there should be a scaling back. Logging such as we have seen done by Louisiana Pacific has outpaced the ability of the resource base to sustain itself. Now, they want to go onto the Bridger Teton and strip it before pulling out. The sooner Louisiana Pacific corporate executives look at the bottom line and see no big profits coming from the Dubois area, the better off the forest resource will be.

There is room on the forest for a number of small logging operations, owned and operated by local people, and somewhat sensitive to other forest uses.

I am appalled that the plan calls for the amount of roading which it does. For a few years I lived in eastern Oregon and saw what timber roads have done to every area outside of wilderness areas. It is not timbering per se which is so destructive of wild life habitat (unless it is large scale clearcutting), but the infernal roading which seems to be so necessary. 1

And as for the premise (God only knows where it came from) that every logging road enhances the recreational opportunities, 2

75-1 In response to numerous concerns, the number of acres managed for timber harvest and the resultant amount of roads has been reduced in the final Plan. In the next fifty years, the Plan projects only eighty miles of new road which will be open to the public. There is projected 120 miles of existing road which will be improved and remain open to the public. An additional 150 miles of new road, and 255 miles of reconstructed existing roads are projected to be closed to the public within the 50 year period. Road construction and reconstruction figures have been corrected. See also response to comments 182-5, 33-9, 80-5, and 44-46.

75-2 The planning process used did not assume that increased roading automatically benefited recreation. The relation of roads (existing and new) to recreation varies depending on the recreation opptunities being provided. Briefly, there are no roads allowed in Primitive areas, no open roads allowed in Semiprimitive Nonmotorized areas, only a certain density of roads allowed in Semiprimitive Motorized, and few restrictions on roads in Roaded Natural and Rural areas. Refer to EIS Chapter VII-Glossary under Recreation Opportunity Spectrum for for definitions. Prescriptions for individual areas were developed based on providing a targeted mix of recreation opportunities in that area. In or near that portion of an area targeted for primitive recreation, roads do not benefit, and in fact are a detriment, to recreation. In that portion of an area targeted for semiprimitive nonmotorized recreation roads will not benefit and may or may not be a detriment to recreation depending on location and road management. In areas targeted for

YPD - 75 - F - 1 - C
Proj. No. Orig Type Appl

2

I think is one of the worst assumptions that could be drawn. I strongly suspect that recreation is thrown into the equation to justify road costs that subsidize the timber industry. That is wrong and should be eliminated. 2

I believe there is still another wrong assumption - that timbering automatically increases ecological diversity. It may or it may not depending upon the site, the site within the area, and the research and pre-planning which should go into a proposed timber sale. It would not just automatically fall out as a result of the forester's desires to get rid of a bunch of bug-killed trees. 3

As for improving habitat for elk, timbering on the Shoshone has generally done just the opposite. And any increased timbering will continue to degrade prime elk habitat and reduce herds.

Historical accounts indicate that overgrazing of the western ranges began in the 1880's. That has continued until the very recent past, and, in fact, in some areas is continuing. The free ranges led to abuses and damages to much of the resource base which is apparent to this day. Many ranges have never fully recovered.

Low grazing fees continue as a subsidy to the western livestock industry. This problem needs to be addressed. 4

Certain areas of the forest such as the North Fork of the Shoshone River should have grazing eliminated in favor of big game. In other areas where livestock grazing encroaches upon game winter range, livestock use should be reduced or eliminated. 5

Any livestock management practices calling for increased grazing through the use of fences should be rejected out of hand. Fencing implies a vested interest in the public lands which goes beyond even the privilege of grazing itself, and is not warranted. Fencing can in no wise be considered beneficial to wildlife. It could only be considered as another subsidy to the western livestock industry. 6

Recreational and aesthetic values of the Shoshone Forest are growing more valuable each year. These values should be considered in their own right and on their own merits rather than as a stepchild to the timber industry. More consideration and emphasis should be given to them. 7

The area stretching from north of Yellowstone National Park to the southern end of the Wind River Mountains is still one of the great wildlife-primitive area resources of the world. The integrity of what is now called the Greater Yellowstone ecosystem should be maintained. That means holding at bay the commercial forces which will destroy it, one small increment at a time. Nobody seems to be assessing the cumulative effect of all those little increments. 8

75-3 Timber harvesting is an activity that will benefit wildlife through enhanced habitat capability and diversity. Stringent standards for wildlife are incorporated into harvest methods, activities and timing. Elk herds on the Shoshone have increased in numbers in the recent past.

75-4 Grazing fees are not controlled at the Forest level but established at National levels.

75-5 In the North Fork analysis area, there are no term permits for domestic livestock grazing. See response to comment 44-4.

75-6 The use of structures such as fences remain the property of U.S. Government, but permittees are responsible for maintenance. Such structures are a useful tool in assuring proper forage utilization. While these structures do not represent a vested interest to permittees, they are eligible for a part of increased capacity based on this contribution to the improvements.

75-7 See response to comment 44-1.

75-8 See response to comment 24-1.

Comment 75

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Proj. No. Orig Type Affil

3

In summary, the Shoshone Forest draft plan should look to reductions in timber harvest rather than an increase. **10**

Road building should be held to a minimum. It should not begin to approach the 665 miles planned for the next 50 years. Roads planned for the future should not include areas of critical grizzly bear habitat, prime elk habitat or important migration routes, and what remains of roadless areas generally. I am particularly opposed to roads and timber sales in the Dunoir Valley, north of Sinks Canyon unless the road intended is over Cyclone Pass to Shoshone Lake, and any areas close to wilderness areas and Yellowstone National Park. **9**

Grazing is a subsidized use of the national forests. With grazing fees set as low as they are, grazing use should be reduced and in some cases eliminated rather than increased. **4**

I support the plan's recommendations to manage the Clarks Fork River and its canyon pending the time when the area can be designated a wild and scenic river. **13**

I also support recommendations to withdraw wilderness and critical grizzly bear habitat from oil and gas development.

I find the range of alternatives for management options unacceptable under the plan as presented. The options should include some which would emphasize recreation and non-commodity uses over timber harvest and grazing. **11**

The plan does not appear to provide for a sound monitoring program. To the outside observer, it would seem to be prudent policy to keep track of what is happening on the ground year by year. And such oversight should not be on just ranger districts but on the forest as a whole, and not on just one forest but all adjacent forests (e.g. Shoshone-Bridger-Teton). The monitoring program should be at least as well funded as the timber road program for it is far more important than timber roads. **12**

Thank you for your consideration.

Sincerely,

Tom Bell

Tom Bell

Forest Service Response

75-9 See response to comment 75-1

75-10 Timber harvest levels in the final Forest Plan have remained approximately at the level of the proposed Forest Plan. The number of acres proposed for treatment has been reduced. This reduction in acreage reflects less emphasis on steeper, less productive areas (primarily stocked with lodgepole pine) and more emphasis on areas with higher productivity. Harvest levels have been established according to the economic viability of individual areas. Forest standards and guidelines are established which will insure that timber sales will not have adverse effects on wildlife, recreation, water, scenic beauty or other resources.

75-13 The Proposed Plan incorrectly states that we can apply for an extension of the protection period for the River. It is contingent upon an act of Congress to protect the River either by including it in the Wild and Scenic River System or by providing additional temporary protection. It is uncertain at this point whether the Clarks Fork of the Yellowstone River will become a part of the National Wild and Scenic Rivers system. The Forest Service and the Administration are in favor of the River's inclusion. Management activities that are within the discretion of the Forest Service will be designed to maintain the River's eligibility. Other activities that are presently within the discretion of agencies such as BLM (minerals) or Federal Energy Regulatory Commission (hydropower development) could affect eligibility characteristics of the Clarks Fork. In the event such developments are proposed, we would recommend denial to the appropriate agency, until Congress acts. See also response to comment 97-1a.

75-11 See response to comment 44-1.

75-12 See response to comment 44-55.

Comment 76

RECEIVED OCT 1 1985

BOX 801
DUBOIS, WY. 82513
SEPT 29, 1985

DEAR SIR: FOR-76-F-L-O
Proj. No. Orig Type Affil

I AM WRITING THIS NOTE TO YOU REGARDING THE SHOSHONE NATIONAL FOREST PLAN. YOU KNOW THIS IS A PRISTINE AREA AND I AM ASKING YOU TO RECONSIDER OPENING NEW ROADS, TO CURTAIL TIMBER HARVESTS AND STOP ALL GAS AND OIL LEASING IN THIS AREA.

I KNOW WE HAVE TO & SHOULD HAVE SOME TIMBER HARVESTS BUT LET THE SMALL OPERATOR DO THE JOB. IF THE LOUISANA PACIFIC CORPORATION WHO IS CONSTANTLY THREATING TO CLOSE THEIR OPERATION WOULD DO SO. SO BE IT. I CAN SEE THEIR POLLUTION SIX MILES EAST OF DUBOIS ON MANY OCCASIONS.

THANKING YOU FOR YOUR CONSIDERATIONS.

SINCERELY YOURS,

Felix Kotarska

1

Forest Service Response

76-1 The Forest Plan provides for a balanced mix of Forest uses. The laws governing mineral operations on National Forest System lands state under what conditions lands may be withdrawn from mineral entry. Most lands under Forest Service jurisdiction do not qualify for withdrawal. The Forest Service does not control who purchases offered timber. Contracts are awarded competitively. See also response to comment 132-4.

RECEIVED OCT 1 1985

FP - 77 - E - L - B
Proj. No. Orig Type Affil

Absaroka Ranch

September 28, 1985

Stephen P. Mealey, Forest Supervisor
Shoshone National Forest
P.O. Box 2140
225 West Yellowstone Avenue
Cody, Wyoming 82414

Dear Mr. Mealey:

I'd like to take this opportunity to comment on the Land and Resource Management Plan for the Shoshone National Forest. I am a member of the Dubois Outfitters Association, so, many of my positions will mirror those presented in our letter of September 21.

Timber - My stand is identical to our Association's: I favor emphasis on salvage sales instead of green sales. Specifically, I oppose, for obvious reasons mentioned in our Association's letter, the "Ramshorn" and "Six Mile" sales scheduled for 1990 and 1993 respectively. I intend to galvanize intense opposition to these developments if they proceed as planned. | 1

Roads - We have too many of them. I support a cutback in general use access on existing roads and complete obliteration of all newly constructed roads. | 2

Trails - A sad state of affairs. We need more money diverted to trails for both maintenance and construction. | 3

Grazing - I can't support additional A.U.M. allotments until present ones are administered and utilized efficiently. My stand on this issue is identical to our Association's. | 7

Mineral Exploration, Development, and Extraction - Again, my position is like that of our Association's. To reiterate: I favor complete curtailment of both seismic and drilling efforts on our forest until such time as our national needs reach a point of true necessity, even crisis. | 4

Fire Management - I support the Plan's proposal to allow naturally-caused fire to play a larger role in the forest ecosystem.

Outfitter/Commercial Use Permits - Two things. First, let's uniformly enforce the 14 day summer restriction. I mention an exemption that a certain outfitter located at the mouth of Bliss Creek enjoys. This is an abomination, a violation of the spirit of this rule. Second, how can additional outfitter permits be proposed in the Plan when we are already at the point of saturation? I find this proposal ludicrous. | 5

I want to thank you for this opportunity to comment. One last suggestion, however: Let's extend the comment period another 90 days in order to allow more participation from some truly credible voices out there. You people have mentioned the low response to the Plan. It's because the previous 90 days are the absolute worst for a comment period. In short, people are exceptionally busy this time of year; it's not a matter of apathy, rather one of simply not having sufficient time. Please do consider this suggestion. Once again, Many thanks. | 6

Sincerely,
Robert B. Sette, Jr.

77-1 In the 1984 Wyoming Wilderness Act, Congress directed that nonselected roadless areas be released for multiple use purposes, and that "buffer areas" were not to be considered adjacent to wilderness. With this in mind, the Wolf Creek timber sale has been included in the Forest Plan. Planned sales between Five Mile Creek and the Dunoir Special Management Unit have not been included in the Forest Plan; this has been allocated to Management Area 3A rather than Management Area 7E. No logging or road building will take place in the Dunoir Special Management Unit. See also response to comment 44-46.

77-2 In response to numerous concerns, the number of acres managed for timber harvest and the resultant amount of roads has been reduced in the final Plan. In the next fifty years, the Plan projects only eighty miles of new road which will be open to the public. There is projected 120 miles of existing road which will be improved and remain open to the public. An additional 150 miles of new road, and 255 miles of reconstructed existing roads are projected to be closed to the public within the 50 year period. Road construction and reconstruction figures have been corrected. See also response to comments 182-5, 33-9, 80-5, and 44-46.

77-3 The Forest Service recognizes the need for additional emphasis on trail construction and maintenance, and wilderness dispersed camping site reclamation. Implementation of the Plan would provide for this additional emphasis.

Currently, Congress disperses money to the forests by appropriation. This means there are separate monies for trails, roads, dispersed recreation. By law, the Forest Service cannot use money appropriated for one function, to do work in another. Thus, road money cannot be diverted to trail work.

77-4 See response to comment 12-4.

77-5 The public response to the proposed new outfitter/guide camps has been overwhelmingly negative. Therefore, no new outfitter/guide camps are allocated in the Forest Plan.

77-6 See response to comment 140-2

77-7 The Wilderness Acts provide for continued grazing. Abuses of grazing permits will not be tolerated as stated in the prescriptions and standards for use.

Comment 78

Forest Service Response

RECEIVED OCT 1 1985

FPD-78-b-1-C
Proj. No. Orig Type Affil

2315 Sky View Dr.
Laramie Wyo 82070
Sept 09, 1985

Supervisor S. P Maley
Shoshone National Forest
P.O. Box 2140
Cody Wyo 82414

VI-225

Dear Sir

The highest priority is not jobs here in the Shoshone National Forest, but the preservation of the health of the Greater Yellowstone ecosystem and the forest with the wild animals. Leave a little of the U.S.A. without asphalt roads, houses, stop light and right of ways. I'm sure the animals after all these years do not want to learn to read stop signals etc. Let's leave a little of Gods work untouched by what we call civilization.

Sincerely,
Rudolf Kucharba

1

78-1 See response to comment 24-1.

Comment 79

RECEIVED OCT 1 1985 September 29,1985

FPD - 79 - F - L - C
Proj. No. Orig Type Area

Mr. Stephen P. Mealey, Forest Supervisor
SHOSHONE NATIONAL FOREST
P.O.Box 2140
Cody, Wyoming 82414

Dear Mr. Mealey:

I would like to take this opportunity to commend you and your planning staff for the work put into the 50 year plan for the SHOSHONE NATIONAL FOREST. Management objectives to please all forest users is a difficult assignment; and I appreciate the chance to give my input.

I have tailored my response along a more general outline, as I'm sure by now you have recieved detailed problem analyses from larger organizations.

TIMBER

Your efforts to maintain a viable timber industry in the Dubois area by maintaining or increasing the amount of MMBF of harvestable timber may be commendable but not realistic. Nationwide, the general state of the timber industry is suffering from lessening product demand, low prices, and competition from foreign imports. Small communities such as Dubois need, for their overall continued well-being, a stable economic base; and this certainly cannot be provided by a mill operation whose primary product is 2 x 4 studs, tied to the rise and fall of new housing start demands, and certainly more susceptable to broader market driven effects of which the Forest Service has little control over.

I favor Alternative C which would provide less MMBF of timber. Couldn't good silvicultural management and improved wildlife habitat be accomplished with scaled-down harvests targeted towards the smaller, more product-versatile mill operations? Small communities, such as Dubois need to diversify their economy, and perhaps the Forest Service needs to acknowledge as such rather than helping to perpetuate certain "dinosaur" type wood products industries. There will always be a timber industry in the SHOSHONE; smaller maybe, but efficient and and a secure source of employment for the future.

LIVESTOCK GRAZING

With minor exceptions, I do not find management objectives for livestock grazing opportunities much of a problem. Locally, ranchers are doing a pretty good job of managing their allotments. Some problems do exist however, but could be resolved by more closely monitoring the situation and reminding ranchers that grazing allotments are on Public Lands. Therefore any abuses should be dealt with in the same manner as other types of abuses are.

I am opposed to the conversion of unused sheep allotments to cattle allotments. Most sheep allotments occur in highly sensitive alpine areas and should be returned to wildlife and visual/recreational type uses.

Ranching, like the timber industry, is market driven. In my conversations with the larger of the local ranch operations, I found that existing grazing opportunities are not being fully utilized at present. As ranches become more efficient and more sophisticated in their response to market conditions, you may find an improved breed of animal more able to utilize less AUM's of grazing capacity. Alternative C , while providing less grazing capacity, still can maintain the ranch operations at current levels and provide incentive for future efficiency in the market.

Forest Service Response

1 79-1 Timber harvest levels in the Forest Plan have remained approximately at the level of the proposed Forest Plan. The number of acres proposed for treatment has been reduced. This reduction in acreage reflects less emphasis on steeper, less productive areas (primarily stocked with lodgepole pine) and more emphasis on areas with higher productivity. Harvest levels have been established according to the economic viability of individual areas. Forest standards and guidelines are established which will insure that timber sales will not have adverse effects on wildlife, recreation, water, scenic beauty or other resources.

2 79-2 Neither analysis area 194 nor analysis area 195 will be managed for domestic livestock. Should a conversion from sheep to cattle be proposed, only after an analysis concludes the range is suitable will a conversion be made.

ROADS AND TRAILS FPD-__79-__F-__L-__C
Proj. No. Orig. Type Alt.

It could be said that the first few users of a new road may experience a high quality roaded-recreation experience. However, a direct corellary exists between increased use and increased resource damage. With more roads comes more abusee, more maintenance costs, loss of wildlife habitat, increased hunting preasure, dust problems, etc. Numerous examples exist in Wyoming and in other states where increased roaded access to once pristine forest lands have caused irreverable resource damage.

I believe the road system in the SHOSHONE is already more than adequate for current management needs, both commodity and non-commodity. Although Alternative C provides for more miles of open roads and less miles of controlled roads, I prefer it because there would be less new road construction. Regardless of which alternative you choose, one of the most pressing problems is the effectiveness of road closures. Historically, the record is poor. From what I have seen in the Dubois area, the local attitude is, "I'll drive where I damn well please". And when caught, reprimands seem hardly more than "a slap on the hand". 3

As for the current trail system on the SHOSHONE, I would like to see more of the budget directed to maintenance and improvements. Inadequate horse user facilities and backpack facilites exist at most wilderness trailheads. Nationwide, there is an increase in demand for non-motorized recreation opportunities. With the amount of wilderness and non-roaded forest lands in the SHOSHONE, I believe this resource should be recognized as high-value and therefore given more consideration in future budgets. 4

I am not opposed to some sort of forest user fees. I belive that if both roaded and non-roaded recreationists were required to pay a use fee, then several million dollars could be generated on the SHOSHONE annually--a significant contribution for road/trail maintenance and an overall increase in quality recreation experiences.

THREATENED AND ENDANGERED SPECIES

I strongly urge you to avoid new roaded access into Situation I grizzly habitat and otherwise unroaded Situation II areas pending future habitat classification studies and updates. I applaud your efforts in prioritizing bear recovery, not only on the SHOSHONE, but relative to the greater Yellowstone Ecosystem as well. In this light, all mineral exploration and leasing should be denied in Situation I habitat also. Education of the public will play an important role in minimizing future bear/human conflicts, and I would encourage an aggressive campaign to alert the public as to the importance of bear recovery in the Greater Yellowstone Ecosystem. 5

MINERAL EXPLORATION AND LEASING

I still have a problem with oil/gas exploration and leasing on national forest lands. For instance, with the exception of a small area in the eastern SHOSHONE in Park county, most USGS and Forest Service studies show low or no economical reserves of hydrocarbons. Yet, every year more drilling rigs are being allowed to drill. Although the impacts of exploration may be short-lived, the ramifications of development of a major find are tremendous. Enhanced secondary and tertiary recover methods are breathing new life into oil and gas fields outside national forests, and I urge you to prioritize wildlife and recreation resources as highest within the SHOSHONE; recognizing them as the truly long-term renewable resource which you can offer. Alternative C is preferred as it is lowest in terms of an irretrievable commitment of surface resources. 6

79-3 In response to numerous concerns, the number of acres managed for timber harvest and the resultant amount of roads has been reduced in the final Plan. In the next fifty years, the Plan projects only eighty miles of new road which will be open to the public. There is projected 120 miles of existing road which will be improved and remain open to the public. An additional 150 miles of new road, and 255 miles of reconstructed existing roads are projected to be closed to the public within the 50 year period. Road construction and reconstruction figures have been corrected. See also response to comments 182-5, 33-9, 80-5, and 44-46.

79-4 The Forest Service recognizes the need for additional emphasis on trail construction and maintenance, and wilderness dispersed camping site reclamation. Implementation of the Plan would provide for this additional emphasis.

Currently, Congress disperses money to the forests by appropriation. This means there are separate monies for trails, roads, dispersed recreation. By law, the Forest Service cannot use money appropriated for one function, to do work in another. Thus, road money cannot be diverted to trail work.

79-5 Adequate protection measures for the grizzly are in the Grizzly Bear Guidelines and in Standards and Guidelines. Site-specific projects will be analyzed in accordance with NEPA and the ESA.

79-6 At present, the Forest Service is constrained from making lease recommendations based upon subsurface values. Subsurface is the responsibility of the Bureau of Land Management. Our charter is to recommend lease denial or appropriate regulatory stipulations based upon the capabilities and sensitization of surface resource. The Forest Plan, Alternative D was selected because it allows mineral activities while emphasing values of wildlife and recreation resources.

Comment 79

SITE-SPECIFIC PRESCRIPTIONS FPD - 71 - F - L - C
Proj. No. Orig Type Affil

WIND RIVER (191) All of the area west, north, and east of Brooks Lake, which includes the Jade lakes, Upper Brooks, Jules Bowl and Bonneville Pass should be assigned a prescription 3B to insure quality recreation and prevent resource damage to highly sensitive alpine and riparian areas. Prescription 4B areas are critical--I have observed Bighorn Sheep in these areas during winter. Additional snowmobile restrictions could benefit the sheep if enforceable and also curb unlawful intrusions into the nearby Teton wilderness and Dunoir Study area. Prescription 2B should end at the southern end of Brooks Lake. Brooks Lake Lodge should not be allowed to develop beyond its current size. The development plans proposed by the current owner-Kern Hoppe are unacceptable and out of line with current use of the Brooks Lake area. Any management plan decided upon for the Brooks lake area should resolve once and for all the Brooks Lake Lodge problem. Personally, I would encourage the renovated lodge structure and the 2 house structures built in 1977 be kept, and all remaining structures removed. The lodge may have potential for a science school or nature center, but will never make it as a commercial operation. **7**

PARQUE CREEK/RAMSHORN (184/185) Due to an important migration route of some 2000+/- elk in the Five-mile, Six-mile, and Brent creek drainages, I recommend that the management prescription be changed from 7E to 3A or 3B to insure the integrity of existing populations of elk and other wildlife. Additionally, any road building will prove to be costly in terms of construction and maintenance due to the unstable nature of the soils predominant in those areas. **8**

UNION PASS (187) I would recommend that the Bachelor Creek timber sale be reconsidered and all of the Bachelor Creek drainage changed to prescription 3A. The Bachelor Creek trail is currently an important horseback and foot access to Moon Lake. The Bachelor Creek timber sale and 4 miles of new road would damage the integrity of this non-motorized recreation area. **9**

CONCLUSION

In summary, Alternative C may not address all my concerns, but it is preferable to Alternative D. The most important assets of the SHOSHONE are its spectacular scenery, diverse and abundant wildlife populations, and recreational opportunities. The non-commodity emphasis of Alternative C will not spell doom for Dubois as sufficient smaller commodity-oriented industry is already in place and may even benefit. On a broader scale, as recreation opportunities are enhanced, larger commodity-oriented jobs will be replaced by recreation-oriented jobs and services. In the last five years, new telephone subscriber hookups (some 200 +/-) can be attributed to people who have moved to this area to appreciate the amenities of the forest, not the commodities.

Finally, whatever the alternative chosen, I would like to see that the cumulative effects of any proposed activities on the Greater Yellowstone Ecosystem be fully addressed. I believe that the concept of a unified management direction for and recognition of the Yellowstone Ecosystem is an idea whose time has come. **10**

Thank you,

Michael J. Kenney

Michael J. Kenney
Box 574
Dubois

pages tightly bound

Forest Service Response

79-7 The majority of the area in question has been re-allocated to 3A. None has been allocated to 3B.

79-8 In the 1984 Wyoming Wilderness Act, Congress directed that nonselected roadless areas be released for multiple use purposes, and that "buffer areas" were not to be considered adjacent to wilderness. With this in mind, the Wolf Creek timber sale has been included in the Forest Plan. Planned sales between Five Mile Creek and the Dunoir Special Management Unit have not been included in the Forest Plan; this has been allocated to Management Area 3A rather than Management Area 7E. No logging or road building will take place in the Dunoir Special Management Unit. See also response to comment 44-46.

79-9 The Bachelor Creek Timber Sale has been left in the program. It has been reduced in size and volume, and has been placed closer to the existing road. The area has not been changed to a 3A allocation. In accordance with Forest Standards and Guidelines, new roads constructed for the sale will be closed following logging.

79-10 See response to comment 24-1.

Comment 80

RECEIVED OCT 1 1985

FFD - 80 - E - L - C
Proj. No. Orig Type Affil

P. O. Box 659
Dubois, WY 82513
Sept. 27, 1985

Stephen P. Mealey, Supervisor
Shoshone National Forest
P. O. Box 2140
Cody, WY 82414

Dear Mr. Mealey:

I appreciate very much the tremendous effort you and your planning staff have put into the development of alternatives for a comprehensive 50-year management plan for the Shoshone National Forest. I also appreciate the opportunity to suggest changes in the plan.

I agree wholeheartedly with the statement on page ii of the LRMP that because of impacts on wildlife and recreation and people management problems the amount of road system open to unrestricted public use cannot be allowed to grow beyond the current level. This agrees with the conclusion on page B-41 of the DEIS that the forest has a low potential for producing commodities and that its major values are wildlife, scenic beauty and recreation. This is demonstrated by benchmark runs 3 and 4 which show a benefit:cost ratio of 5.3:1 for commodities and recreational and wildlife values together vs a minus 34:1 for commodities alone. In other words commodities return less than the cost of development and marketing, but by assigning values to side benefits for recreation and wildlife such development and marketing may be justified. 1

Despite the acknowledgement that commodity development is uneconomic, the preferred alternative proposes to increase both timber production and grazing. This seems to be contradictory to reason and not in the public interest, especially at a time when many grazing leases are currently unused and the timber market is very weak.

The need for local jobs is given as a reason for maintaining or increasing timber production, but no consideration is given to the effect of selling government timber below cost of production on the private timber industry. If lumber is needed it should be produced wherever it is most economical to do so, the same as any other commodity, and those who wish to work in the industry should go where the market demands. 2

VI-229

Forest Service Response

80-1 Conclusions reached by the commenter regarding the benefit-cost ratios for benchmarks 3 and 4 are incorrect. Both benchmarks include the total cost of managing the Forest in calculation of the benefit-cost ratios. In other words, costs of wildlife management, recreation facilities, trails, roads and all of the overhead for these programs are included in each benchmark. The difference is that in benchmark 3, only revenues derived from timber grazing and those collected for fee area campgrounds are included in calculation of the benefits. This in no way means that these programs do not pay for themselves. Rather, it means that revenues generated by these commodities can not pay for management of the entire Forest for multiple-uses. In fact, the revenues from producing commodities except developed recreation far exceed the costs of those programs. See response to CHEC's discussion on timber and range program.

80-2 In principle, the comment is valid. Community stability is a much overused reason for maintaining harvest levels above that which is economically efficient. However, economic efficiency is only one of the factors which the Forest Service must consider in planning for management of the Forest. The National Environmental Policy Act and the planning regulations require that all effects be estimated and a course of action chosen which maximizes net public benefits. Admittedly, net public benefits might be difficult to define, however there may be instances where harvesting of timber above the economically efficient level is warranted, for example for social stability, economic stability, wildlife needs, recreation needs, or needs to control insect and disease outbreaks. See also response to comment 14-3.

Over the last 5 years, the economy of Lander has suffered dramatic downturns related to declines in the energy industry and mining including the closing of a major mine at South Pass. To aid this economy, a small timber mill in the area expanded with the aid of local and State funds. This mill requires about a million board feet of timber per year to remain solvent and pay off State and local loans. The mill contributes to the local economy, employs locally people and adds to the diversity of economic activity in this community. In the original analysis of timber harvest, only 230 MBF was scheduled for harvest on an average annual basis for the Lander District. This harvest level was reanalyzed. Reanalysis showed that the District could easily support 500 MBF per year on a sustained basis. Careful examination of the current condition of timber on this District indicated areas where such an increase in harvest could be beneficial in helping control the spread of insects and disease and improving cover to forage ratios for wildlife. The Plan, therefore, transferred about 270 MBF of average annual harvest originally scheduled for the Wind River District to the Lander District throughout the first 10 years of the Plan. At the time the Plan is revised, this decision will be reexamined. Such timber harvests will provide a positive PNV though not as high as if they were done on the Wind River District because of an increase in road needs. Given that comments from both sides of the timber harvest issue called for support of small, local mills, this minor decrease in PNV is justified. Currently on the Lander District, there are many stands of dead and diseased lodgepole pine. The Lander mill provided information indicating that a portion of their mill requirements can be comprised of such timber.

Comment 80

FPD- 80 F- L- C
Proj. No. Orig Type Affil

I believe timbering should be limited to areas where it can be done economically and in a way that will enhance recreational and wildlife values—those resources that the forest is most capable of producing.

Although management and development of commodities generally cost more than the income derived from them, such income, along with providing local jobs, is used as a reason to develop them. The economics of future harvests is questionable because of the impossibility of predicting market conditions and the additional investment of non-commercial thinnings required to attain reasonable growth rates. Projections show that no more timber will be available in 120 years after at least two thinnings than is available now in old growth stands, which are economically marginal timbering propositions. Timbering plans should therefore be flexible and responsive to market conditions and not scheduled before economic conditions are known. 3

Perhaps the Forest Service should consider another source of income—a forest user fee—such as the Park Service now charges to use the national parks. A $10 annual fee for private vehicles using forest roads could generate over $1 million annually for forest management. This would more than double the forest recreation budget resulting in a larger Forest Service recreation staff to manage wilderness, maintain trails, improve wildlife habitat, etc., and could eventually offset the loss of timber-related jobs resulting from emphasizing recreation and de-emphasizing timber. This would lead to a higher quality recreation experience, more recreationists, and therefore more income to the communities. 4

Vegetative diversity and wildlife habitat improvement are mentioned often as reasons for timbering. This may be a valid reason in some situations, but only if the species managed for are considered of more value than those that will be displaced by loss of old growth habitat. This judgement is subjective, but is not addressed in the plan other than to provide for leaving some patches of old growth, which will be of questionable value because of their small size(30 to 120 acres). Road closures will have to be more effective than they have been in the past to accomplish the improvements for big game, and monitoring will have to be seriously pursued. If road closures and monitoring cannot be assured, then timbering cannot be used as a tool for habitat improvement. 5

One area that can be improved for wildlife is the Whiskey Mountain bighorn sheep winter range. There is little doubt that in this instance development of the sheep winter range is the highest and best use of the area. It helps make up in a small way for large areas of former sheep winter range that have been destroyed or made unavailable by man. Public enjoyment and appreciation of this wild sheep herd is immeas- 6

Forest Service Response

80-3 Market conditions have been estimated as well as future costs of management. If information becomes available which significantly changes these estimates a reanalysis of management will occur. Costs of management, including costs of precommercial thinning and commercial thinning, have been included in the economic efficiency analysis which determined the planned timber program. See also response to comment 14-3.

80-4 The Forest Service recognizes the need for additional emphasis on trail construction and maintenance, and wilderness dispersed camping site reclamation. Implementation of the Plan would provide for this additional emphasis.

Currently, Congress disperses money to the forests by appropriation. This means there are separate monies for trails, roads, dispersed recreation. By law, the Forest Service cannot use money appropriated for one function, to do work in another. Thus, road money cannot be diverted to trail work.

The assessment of fees for dispersed use of National Forest lands requires legislation and is therefore beyond the scope of this Plan.

80-5 Roads designed in connection with timber sales will be designed to make closures effective and enforceable.

80-6 See Management Area 8E in the Forest Plan.

Comment 80

FPD - 80 - F - L - 0

Proj. No. Oc.

urable. Since the area is classified wilderness, motorized travel is prohibited and will not be a problem in displacing the sheep in the improved area as can happen in areas where roads are closed only by administrative action. 6

Control of disease is mentioned repeatedly as an advantage of timbering, but the use of prescribed fire is not seriously considered, and the self-limiting nature of disease is not mentioned. I think disease problems are overemphasized and seem to be used as an excuse for timbering. Cutting could even be counterproductive in controlling Comandra rust because its intermediate host, toad flax, grows best in open areas. Where beetle-infested trees are ignored a natural thinning affect often occurs, creating vegetative diversity, which the plan proposes to accomplish through logging. Where timber values are marginal at best the presence of disease can hardly be considered a serious problem. If a healthy tree is not worth harvesting, a sick one is no less valuable economically. 7

The plan to log 5900 acres of steep slopes in Alternative D seems to be very speculative. Where timber values are already marginal the additional cost of specialized equipment to log steep slopes would likely be prohibitive. I think these 5900 acres should be omitted from the timber base. 8

I am concerned about the effects on migrating elk of 13 miles of roads to be built for the proposed Brent Creek and Six-Mile Creek timber sales. The activity will be directly on the migration route between summer and winter range of 2000 or more elk. Road construction will be very expensive because of slumpy soils, and if the roads are not closed effectively the migration could be adversely affected. Increased hunting access could lead to more restrictions on hunting and further shrinkage of elk range. I think these timber sales would be marginal at best, and possibly should be reconsidered if they will not benefit elk, which is the most important resource in the area, in my opinion. 9

I am opposed to the transfer of allotments for 12,000 domestic sheep AUMs to cattle allotments. The alpine areas where most of these allotments are located are sensitive to surface damage, which would increase with cattle use. The forage could better be used to improve game distribution, and since the grazing program loses money for the government and adds to the surplus of cattle on the market it should be phased out as permittees go out of business. This policy would be in keeping with the objective of managing primarily for recreation and wildlife and would raise the quality of recreation on the forest. 10

The number of noncunsumptive wildlife user days (WUD) was arbitrarily set to equal consumptive WUDs. I believe this to be low, especially in the case of bighorn sheep. Several thousand noncunsumptive WUDs are recorded annually vs a few hundred consumptive WUD for the Whiskey Mountain herd alone. 11

Although it has an insignificant affect on the plan, valuing

Forest Service Response

80-7 The Forest Plan utilizes the best currently available scientific information regarding silvicultural practices. This information contributed to the establishment of the silvicultural standards and practices listed in the Forest Plan. As additional knowledge is gained, practices can be improved.

With vast, continuous areas of heavy timber (those most susceptible to insect and disease attack), it is very difficult and expensive to attempt to control burn acres of 40 acres or less. In addition, lodgepole pine stands with nonserotinous cones, are slow to regenerate naturally following fire.

80-8 The Forest Service cannot make the economics decisions for individual private logging companies as to whether it is economical to bring in equipment needed to log steep slopes. Therefore these lands have been considered tentatively suitable. However, with the current methods of appraisal, stump age values on these lands are less than on 0-40% slopes. In the Final Forest Plan no steep slopes are in the suitable category due to economics.

80-9 There are areas of unstable soils in this area. The silvicultural prescriptions for this area call for group selection and selection harvesting. These systems will not contribute to increased soil instability and areas of specific high hazards will be avoided in road location and sale layout. Seasonal road closures, particularly in the Spring, will prevent disruption of the elk migration and calving areas. Harvesting of elk in the Fall is controlled by limited permits issued by the Wyoming Game and Fish Department. Timber sale layout and road locations will be designed to provide escape and hiding cover for migrating elk with road closures implemented if needed.

80-10 See response to comment 44-16.

80-11 We agree that nonconsumptive wildlife use probably exceeds consumptive use; however, there is no existing data to indicate what the difference is forestwide. We therefore took a conservative approach and used a 1:1 ratio.

Comment 80

FPD-80-E-1-0
Proj. No. Orig Type Appl

Although it has an insignificant effect on the plan, valuing increased water run-off from clear-cuts at $45.50/acre-foot is not a valid benefit of timbering because down-stream storage is already at capacity. The price quoted is also unrealistic since it does not consider delivery and storage costs. **12**

Alternative E reduces the timber harvest below current levels by way of budget cuts. The budget constraints also result in road closures, which cause FORPLAN to automatically reduce recreation outputs. I think it is unfair to equate reduced recreation opportunities with reduced timbering since recreation could be provided without timbering if money were available either by budgeting or by user fees. **13**

The plan states that current and projected wilderness recreation capacity greatly exceeds use, but monitoring of use may not be accurate. At the Glacier trail entrance to the Fitzpatrick Wilderness, for instance, the register is located at the new trail head, while most of the horse traffic uses the old trail head, grossly under-recording use of the wilderness. At the Horse Creek entrance to the Washakie Wilderness the register is located along the trail instead of at the trail head. Horse users tend not to register because of the inconvenience of stopping and dismounting and possibly controlling several pack horses. Registers are nonexistent or difficult to find at other trail heads such as East Fork, Bear Basin and Jakey's Fork. These monitoring deficiencies should be corrected. **14**

Regarding the 7 proposed new large group commercial camps I see no need for any of them in the areas mentioned. Caldwell Creek, Ramshorn Basin, Cougar Creek, Alkali Creek, Sheridan Pass and Simpson Lake are all used extensively by private hunters. A camp at Alkali Creek would be in direct competition with the Bear Basin Camp, all are easily accessable by private hunters, and none of the areas are in need of additional hunting pressure, according to the Game and Fish Department.

In addition to these proposed new camps, the plan to effectively move the Bob Creek camp to the Moose Lake area in the Dry Creek drainage seems to have very little merit. There is no satisfactory camp site near Moose Lake or anywhere above Hayes Park for a commercial operation of any size. Furthermore, the small elk population in the area is hunted regularly by several local hunters, and during the winter it suffers further unknown mortalities on the Indian Reservation. The number of elk as well as the size of bulls in the herd has deteriorated noticably in recent years. The placement of a commercial camp on Bob Creek was a mistake that should not be compounded by moving it to another area that doesn't need it and can't handle it. **15**

Forest Service Response

80-12 As part of analysis, a "minimum level" benchmark was made to estimate the value of goods and services that would be produced if there was no management of the Forest. This included estimating the water produced naturally on the Forest and the economic value of the water. The ability to increase this water volume through management activities is insignificant. Further, the net economic values from production of all goods and services under minimum level management was subtracted from the net economic values presented for all alternatives. This means that water production played no role in selection of management strategies in alternatives and timber harvest was not justified in terms of water production. Both of these points are discussed in Chapter IV and Appendix B of both the DEIS and EIS.

80-13 Reductions in recreation in Alternative E were not due to decreasing timber harvest, but rather due to decreased expenditures on management of recreation including facility maintenance, use monitoring, and law enforcement. In the reduced budget alternative there is drastic reduction in management of all resources causing whole areas of the Forest to be more or less shut down or at least without development or maintenance of facilities including roads and trails.

80-14 Forest Service personnel have long realized that a single method of recording visitor use in the wilderness may not be totally accurate. In order to come up with more accurate data, a combination of registration boxes, automatic trail counters, and Forest Service Wilderness Guards contacts are used. Chapter II of the Plan, under the heading RESEARCH NEEDS, also reflects the need for additional research in this area.

80-15 The Plan identifies a potential outfitter/guide camp near Moose Lake in Dry Creek. We believe this can be a viable operation. The camp in Meadow Creek is not identified because it does not meet the criteria for a large group camp as shown in EIS, Appendix H. The camp at Moose Lake will replace the existing Meadow Creek Camp.

The public response to the proposed new outfitter/guide camps has been overwhelmingly negative. Therefore, no new outfitter/guide camps are allocated in the Final Forest Plan.

Comment 80

FPD-80-F-L-C
Proj. No. Orig Type A...

I fully support the idea of not allowing mineral leasing in critical grizzly bear habitat. I also think, due to the marginal nature of timbering and grazing, that these activities should be phased out of at least Management Situation 1 areas. It is also important that the cumulative effects of all contemplated activities be assessed before any one of them is allowed in grizzly bear occupied habitat. 16

In light of the conclusion that the forest's greatest resources are its wildlife, recreational opportunities and scenic beauty, it seems to me that more emphasis should be placed on the management of these resources than Alternative D offers. It is proposed to continue commodity outputs at greater than present levels while no attempt is made to increase wildlife populations even though the human population and demands for these resources are projected to increase significantly. 17

Although Alternative C has its problems I would prefer it over Alternative D because it puts less emphasis on commodities. However I see no reason why the desirable features of two or more alternatives could not be combined to meet the chosen management objectives once these are defined.

Sincerely,

Duane L. Howe

Duane L. Howe

Forest Service Response

80-16 Adequate protection measures for the grizzly are in the Grizzly Bear Guidelines and in Standards and Guidelines. Site-specific projects will be analyzed in accordance with NEPA and the ESA.

80-17 Based on all analysis, the Forest Service believes that Alternative D presents a more balanced mix of Forest uses than Alternative C. Alternative D as a whole responds better to the issues and concerns identified.

Comment 81

Forest Service Response

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FPD - 81 - W - L - G
Proj. No. Orig Type Appl

THE STATE OF WYOMING

ED HERSCHLER
GOVERNOR

Game and Fish Department

BILL MORRIS
~~W. DONALD DEXTER~~
DIRECTOR

CHEYENNE, WYOMING 82002

September 30, 1985

Stephen P. Mealey
Supervisor
Shoshone National Forest
P. O. Box 2140
Cody, Wyoming 82414

Dear Steve:

On behalf of the Wyoming Game and Fish Department, I am responding to your request for input into the proposed Shoshone Forest Plan.

It has come to our attention that personnel from the Regional Forest Service Office would like to change or delete various stipulations within the plan that would severely restrict management capabilities and prevent habitat manipulation. Especially formidable would be our objectives for Bighorn sheep in the Whiskey Mountain and adjacent areas. I am sure you are aware of the Bighorn Sheep Comprehensive Management Plan that was written by the Whiskey Mountain Technical Committee which is made up of personnel from various agencies including the Forest Service. The management plan was updated and approved by all agencies involved in 1983.

Over the years some North American races of Mountain Sheep have become extinct and others have declined as a result of man's actions. Future sheep survival will probably be controlled by man also. Rocky Mountain Bighorn sheep are perhaps more symbolic of the rugged mountains of Wyoming than any other game animal and they are avidly sought after by trophy hunters and non-consumptive users alike. The Whiskey Mountain Sheep herd is a highly visible population and commands a great deal of professional and public attention at the national as well as the state and local levels. We feel this issue is so important, on a national level, to the well being of the bighorns in the future that an additional meeting with members of the technical committee, your staff, and other concerned agencies or individuals is necessary prior to a decision being made.

1

81-1 We concur. See Management Area 8E in the Forest Plan.

Comment 81

FPD - 81 - W - 1 - G
Proj. No. Orig Type Affil

We feel this unique species deserves special management considerations that will preserve the population for future generations. Please advise me at your earliest convenience of your thoughts on this matter. 1

Sincerely,

Bill Morris
Director

BM:mn
cc: Jack Sanders, Wildlife Biologist, Shoshone National Forest
Jack Welch, Bureau of Land Management, Lander, Wyoming
Rex Corsi, Chief Game Warden, Wyoming Game and Fish
Don Johnson, Supervisor, Habitat, Public Facility and Access Development Branch, Wyoming Game and Fish
Gary Butler, Assistant Supervisor, Habitat, Public Facility and Access Development Branch, Wyoming Game and Fish
Chuck Clarke, Assistant Habitat Management Coordinator, Wyoming Game and Fish

Comment 82

Forest Service Response

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FPD-82-WJ-L-A

THE INSTITUTE OF MATHEMATICAL STATISTICS

Bulletin

William C. Guenther, *Editor*

September 30, 1985

Stephen P. Mealey
Shoshone National Forest
PO Box 2140
Cody, WY 82414

Dear Mr. Mealey:

I wish to echo the concerns of the conservationist and tourist organizations about the plan for Shoshone National Forest.

In particular eliminate development and road building in areas which conflict with wildlife use. 1

It is a shame to spoil areas which will support many more people continuously through hunting, fishing and tourism than a few loggers over a short period of time.

Sincerely,

William C. Guenther

William C. Guenther

WCG:clf

VI-236

82-1 On some areas of the Forest when a conflict arises between wildlife and commodity production, wildlife will be favored. On other areas, the commodity production will be favored. The overall objective is to maintain habitat sufficient to support Wyoming Game and Fish herd unit objectives.

University of Wyoming, Box 3332, University Station, Laramie, WY 82071 (307)766-6600

Comment 83

Forest Service Response

FPD - 85 - [illegible]
Proj. No. Orig Type [illegible]

Rt 1, Box 1670
Worland, Wyoming 82401
Sept. 28, 1985

Forest Supervisor
Shoshone National Forest
P.O. Box 2140
Cody, Wyoming 82414

Dear Sir:

Thank you for the opportunity to comment on the Land and Resource Management Plan and Draft EIS as proposed. Please excuse my comments that appear to address and item obviously elsewhere in the document as it is very difficult in any document of this size and complexity to tie all the pieces together.

Comments:

Summary of the Draft

Page 8 Notes forage allocated to wildlife will increase "substantially" over current levels — Does this merely reflect "allocation" on paper as forage ~~[illegible]~~ is actually at present allocated at a rate not reflecting real wildlife need or use? What is the current forage allocated to wildlife? I see no table in any of the document reflecting this. What does "substantial" mean (10%, 20% ??). 1

Page 17-D There is a double statement here that is confusing. If domestic livestock grazing is to remain near current levels — is it to remain so for 50 years at which time measurable improvement in on the ground carrying capacity will be [illegible] or will as the carrying capacity assumingly increase so will the actual livestock use increase? ① Where does 2

83-1 Current allocation of Forage for wildlife was inadequate in some areas. The Plan adjusts these allocations to provide realistic needs to meet the 1985 State population objectives. Reservations for wildlife range from 0 to 100 percent (see individual analysis areas). Substantial means "of ample or considerable amount".

83-2 The forage would be allocated to both unless there is a change in Wyoming Game and Fish population objectives or Range Allotment Management Plans.

Comment 83

[illegible] 1a

grazing of wildlife fall into this proposed carrying capacity increase?

Page 22 Problem 7
I am concerned that in light of ~~[illegible]~~ a large volume of undocumented and documented but unverified observations of "large canids" which most observers have called wolves that the status potential of wolves is too lightly covered, especially in a 50 year horizon. You mention for wolf "if reintroduced". I find this alarming in view of the data known to indicate the species may already occur. There is a preponderance of evidence to indicate a much greater consideration for wolf in this document. 3

Page 22 Problem 6-D 467 acres annually which is 24% over current levels of habitat improvement are only taken to a forest as large as the Shoshone especially when competing uses will still occupy many of these "improvement sites." This can hardly be called an aggressive program, instead not much better than passive disinterest. 4

Page 42-3 Aspen habitat is decreasing - you have mentioned symptoms but not causes. Lack of fire, grazing management are among management directed causes for aspen decrease as well as potential increases in aspen types.
Page 43 Could mention Absaroka Front HMP in which is now in Draft form, which is cooperative Sikes Act Agreement with BLM for habitat Improvement

Forest Service Response

83-3 Shoshone National Forest will continue to coordinate with other agencies as identified in Wolf Recovery Plan.

83-4 As much of the critical wildlife winter ranges are outside of Forest, there is limited opportunity for improvement of ths limiting factor. The Shoshone is using an aggressive wildlife habitat improvement program. Twenty-four percent over current levels is significant.

Comment 83

EPD - 83 - [illegible] -2

Page 43 #6 What are the isolated sites of deteriorated range due to wildlife? Please list. 6

Page 43 #6 To simply state that Forest topography is such that intensive grazing systems cannot be developed is a misnomer. Applying good management alternatives, cooperatively planning grazing with adjacent BLM allotments, and considering each area (many are relatively gentle basins) on its own merits will provide enlightened grazing management. Intensive grazing systems should not be read to mean "rest rotation". There are many types of "intensive grazing systems" that can accomplish rest, deferred, light to heavy use pastures without a classic rest/rotation. Topography is often not the obstacle but an advantage to meet multiple use on allotments. 7

LAND and Resource Management PLAN

~~Appendix~~ I

General: Much of the information in the ES and Plan appear to be computer generated with apparently some questionable assumptions. I would hope implementation and monitoring of this plan provides for flexibility enough to substantiate or change such assumptions. I firmly believe some long term significant management mistakes are inevitable using this information under inflexible current assumptions. FORPLAN is a great tool but many of the outputs presented are greatly in excess of the lands ability to produce 8

Forest Service Response

83-6 Examples include portions of North Fork, Basin, Dick Creek, Greybull River, and portions of Whiskey Mountain analysis areas.

83-7 We agree, and the Plan indicates intensive grazing management is not limited to rest-rotation.

83-8 We agree that monitoring of Plan implementation is critical and that this feedback loop needs to be provided so that management of the Forest can be adjusted as needed. Such direction is in the regulations governing land and resource management planning (36CFR219). There has recently been much effort given by the Forest Service in general to the subject of monitoring and implementation of Forest Plan. These efforts have resulted in Supplements to the Forest Service Manual. Discussion of the planning regulations has been added to Plan, Chapter IV. As stated in Plan, Chapter IV, details of monitoring are included in the documents incorporated by reference. All such documents are available for review by the public. It is just not possible to incorporate all details of monitoring into Plan, Chapter IV.

Annually, all monitoring activities and implementation of the Plan will be evaluated and appropriate measures taken if deficiencies are noted. When new information is obtained, the significance of that information as it relates to management of the Forest is evaluated. In cases such as these, response will be taken as appropriate ranging from no response, to issuing a Plan amendment, to completely revising the Plan.

The Plan is in essence a "contract with the public" stating that this is how we are going to manage the Forest for the next 10-15 years. One purpose of planning is to reduce the ability of individual civil servants to change the intent of the Plan towards their personal philosophy. It is up to the Forest Service and the public to see that the Plan is followed or changed to meet needs by appropriate processes.

Most of the money spent in monitoring is included in the "program management" for each resource. This includes keeping resource records, evaluation of standards and guidelines to determine adequacy, and carrying out the monitoring as spelled out in Plan, Chapter IV. The money listed for monitoring in Appendix J is slated for monitoring specific projects rather than for a resource program in general.

Comment 83

Forest Service Response

[illegible]

Appendix J.

I can only speak to those areas of which I am familiar. I am sure many others fall int my comment subjects.

~~Page~~ J-

The idea of crucial preferred winter range is good, however my concern is how it is applied for on the ground management. If major improvements are limited to such areas and more general winter ranges deteriorate to concentrate animals more often in restricted crucial areas - crucial area degredation is inevitable and long term wildlife losses result. Is the on-the-ground management connotation flexible enough to address ecosystem management considerations of wildlife habitat? General winter ranges in many years buffer these preferred crucial areas from consistent annual heavy use so these crucial areas are in good shape for the crucial winters or short crucial periods when they are needed. I would think as many very small crucial + preferred winter ranges as I see noted there is ample room to improve and enlarge these areas or develop new ones. Your Forest is a large + dynamic one - do not overlook potential away from current use areas.

9

83-9 Wildlife improvements are not limited to CPWR, but will be conducted in all areas where improvement is needed.

I note a 10% forage allocation for wildlife all through this appendix. This is arbitrary and capricious. What is it based on. Animals concentrate and disperse seasonally and do not use habitat uniformly. This is a nice catchall if data on numbers, migration corridors, parturition areas, etc are unknown. If this is the case say so. Habitat and use thereof is not uniformly distributed as such an allocation assumes.

10

83-10 Percentage reduction for wildlife for each analysis area is based on State population objectives for each area.

Comment 82

FRP - 83 - W - L - 31
Proj. No. Orig Type Affil
4

11 J-57 Need to incorporate crucial habitat for bighorn via Horley thesis in this area.

12 J-61 There is crucial bighorn habitat here that is impacted by winter snowmobile use.

13 J-70 R1 What does "Crucial preferred winter range is managed to emphasize wildlife" mean. Does it mean livestock use will continue as opposed to most such winter ranges being exclusive use by wildlife? There is good potential for aspen rennovation in this area. Why is not all the crucial preferred range allotted to wildlife here? Riparian protection is to be lauded.

14 J-74 What is meant by moderate output of cattle? How will the crucial preferred winter range be reserved? Cattle utilization in this area the last two years verges on criminal overuse. A 30 year decline in elk spring/summer/fall/and winter use is common layman knowledge in this area and has been accelerated the past 5 years. This management prescription continues this trend. Actions proposed will interfere with game migration, breeding areas (elk), and game output. Plan does not address wildlife trend and corrective action.

Please note there is crucial preferred elk winter range in T45N R1C1W Section 7, SW¼ and Section 18 NW¼. Numerous observations by myself verify this in spite of heavy summer livestock use. ~~Why is there no 10% forage allocation here outside of crucial ranges for wildlife?~~ 20 acres of aspen rennovation is both token and shortsighted in view of the potential and need.

Current levels of livestock obviously overstock the area. How many acres of riparian are fenced? How do your standards or guidelines protect crucial winter range current and potential.

Forest Service Response

83-11 There is no domestic livestock permitted in this unit, therefore, identification of crucial habitat for sheep is not necessary.

83-12 There is no crucial bighorn sheep habitat in this unit.

83-13 In the case of the Dick Creek cattle allotment, an amount of forage adequate to winter targeted numbers of elk is reserved for that purpose. It is impractical to exclude cattle from winter range entirely but forage is reserved for wintering wildlife when grazing seasons and numbers are set.

83-14 "Moderate" outputs of cattle generally refers to the degree of competition for forage with wildlife or recreational stock. In the case of the Gooseberry allotment, an adequate amount of forage will be reserved to provide for targeted numbers of wintering elk. Data will be gathered in the first few years of the first decade to determine if an overstocking problem exists; if one does, numbers and/or seasons will be reduced accordingly. Additional information on wintering areas, migration routes, and breeding areas is always welcome and may necessitate an amendment in the Plan. Information regarding additional opportunities for aspen regeneration is also welcome. Guidelines for managing riparian areas are contained in Chapter III of this document. Outputs of forage are expected to increase forestwide; however, sufficient data is not available on this analysis area to make such a prediction. Downward trends, if identified, will need to be corrected before any increase in stocking is considered.

Comment 83

[illegible] 5

Key livestock use areas utilization is severe by Oct. 1.
Is the AUM output to increase over 50 years? Must address post treatment management (burns, waters, fences, aspen) for livestock and monitoring to ensure objectives are met. Current livestock levels if "no rest" or "deferred only" grazing continues range will continue to decline and output decline, not improve. Ranges sites will not attain or maintain themselves in desireable condition if livestock and utilization levels remain at current level regardless of improvement. Some improvement will only add more sacrifice areas. **14**

Please address opportunity for USFS/BLM Coordinated Grazing Plan development in this area as the same permittees utilize both agency jurisdictions. Considerable forest wildlife values can be impacted in this area. **15**

J-78
Again livestock utilization is severe. It seems odd you identify livestock use in suitable areas is low. This area has considerable public use and the comment of overuse is consistent from layman levels.
The Gold Reef Oil Well is not consistent with this. The high visibility and ease of access will have impact on summering sheep (bighorns) as well. Impact here will be of greater significance than the North Fork Well. **16**

J-92 The area is historic bighorn winter/yearlong range with only infrequent use now. The area has high potential for range site improvement with fire and aspen improvement. Livestock use is severe (please address). **17**

Forest Service Response

83-15 Coordinated grazing plans between the BLM and Forest Service are in many cases desirable. Such may or may not be appropriate in this area. Local District Rangers are authorized to explore such possibilities.

The Cottonwood allotment is in the process of analysis and numbers and seasons will be set to conform with plan guidelines. Chapter III guidelines require protection of all riparian areas, not just those identified as high quality. All management actions, including range use, are subject to these guidelines. BLM and Forest Service managers should definitely explore joint-use plans as possibilities for better management.

83-16 Livestock use of the Greybull allotment will be analyzed during the first decade, and if problems are doucmented, correction action will be taken. The Gold Reef exploration well was evaluated by BLM, Forest Service and Wyoming Game and Fish specialists. It was determined that the action would not have significant detrimental effects on bighorn Sheep. (See Gold Reef Environmental Assessment)

83-17 Information on wildlife usage of the Sugarloaf Analysis Area is scant and any new data or ideas are always welcome. There may indeed be opportunities for range and wildlife improvements. Ten percent of forage, or more in many cases, is allocated to wildlife regardless of the level of output. Level of output (high, medium, low) refers only to the potential for conflict between domestic stock and wildlife. Studies to verify wildlife usage will be of a nature adequate to gather appropriate data. Much more information would have to be gathered and evaluated before bighorn Sheep transplants are considered. Protection of riparian areas is written into guidelines (Chapter III) and applies to all management activities. A BLM-Forest Service cooperative grazing plan was written and approved for the Sugarloaf Area in 1985.

Comment 83

and riparian zones are in extremely poor condition. Elk use in summer is minor due to competition, but has very high potential. The area provides a migratory corridor for up to 300 elk.

Why does any level of livestock output - high to low always have a consistent 10% wildlife allocation? Is this due to the varying amount of suitable range?

- Aspen stands are decadent and dying. 17
Elk breeding activity occurs in this area.
Game and Fish Computer records have some data.
What type of verification studies and monitoring will be done on wildlife use?
Why is there no riparian consideration for this area.
Please address opportunity for BLM/USFS Cooperative Grazing Plans here. Also potential for highern transplant if winter range can be protected.
J-94

P-1 In most cases throughout this District elk use (or non use) in summer is often due to the presence of livestock not that these animals would not be there under the absence of livestock.

J-102

Severe overuse by cattle currently exists. This area provides summer habitat for significant elk numbers until cattle arrive. Elk breeding habitat occurs here also. Moose are not uncommon in spite of extremely degraded riparian zones. Again riparian or fisheries is not considered in your plan. It is apparent that 18
medium and low quality riparian habitats are ignored throughout and only high quality areas addressed. What is the cause of medium and low quality zones in terms of past management and why is no future management for these areas considered?

Forest Service Response

83-18 We direct your attention to Chapter III of the FEIS. A section has been added under the heading Wetlands and Floodplains. In the introductory portion of that section is a statement quantifying wetland and riparian habitat on the Forest. This quantification is the result of an exhaustive survey of wetlands, lakes and streams on the Forest. We are well into the process of classifying all streams and stream segments using a systematic approach that will facilitate protection and management of riparian areas.

We also direct your attention to Chapter IV of the FEIS, under Wetlands and Floodplains and under the Environmental Effects section of other resources, particularly Range, Wilderness, Minerals and Facilities. We feel that the effects of management in riparian areas, floodplains or wetlands are prominently displayed, albeit not quantitatively.

Because of the potential effects on wetlands and floodplains, as displayed in the EIS, a great deal of management direction was promulgated and prominently displayed in the Forest Plan. This direction incorporates the Executive Orders in question, and it incorporates Forest Service Manual direction (FSM 2520) that relates to all riparian areas, not just trout streams or extensive riparian zones. We urge you to look at the Plan, blue pages, particularly under Wilderness Area Mangement (General Direction 19 through 28), Riparian Area Management, and Water Resource Improvement and Maintenance (General Direction 8). Additionally, please look at Management Prescription 9A in the Plan, yellow pages which is devoted exclusively to management of nonwilderness riparian areas. All such direction is intended for broad application to riparian areas not just "high quality riparian". Unfortunately, the reference in the planning documents to high quality riparian has proved to be confusing. There is no intent to ignore any riparian habitat, wherever or in whatever condition it is found. High quality riparians in the Appendix J context are merely those outstanding or large examples of that ecotype, potentively subject to management activities.

You may be interested in Plan, Appendix G, which is a watershed problem assessment and current listing of project sites stated for improvement. Please note the identification of grazing as a specific problem area, and also note the number of stream (riparian) related projects which we intend to implement.

Comment 83

There is opportunity to utilize this as a pasture in a Coordinated Plan with BLM as this permittee has very extensive allotment on BLM lands. Periodic rest is a viable prescription for this area in terms of grazing. You have not addressed the potential for habitat or range improvement (fire etc) here. Up to 4 outfitter utilize this area and maintain camps on adjacent State, Federal, or private land. 18

J-124

What is the potential in all this alpine area for ptarmingan reintroduction? Large numbers of elk migrate through this area and some summer there. Bighorn sheep are consistently seen in this area and crucial winter range by the Needles Needs to be identified as such. Historically on adjacent BLM, Private + Forest lands up to 250 bighorns wintered, + significant numbers were year-long residents. 19

You have good fisheries in Rock Creek + S. F. Owl Creek. Riparian + fisheries habitat monitoring should be included. These areas respond extremely well to a rest year periodically and are mostly above 10,000 elevation. This is try, fragile watershed and vegetation for annual grazing use due to a 30 day growing (frost free period) or less. There may be future BLM/FS cooperative grazing management plan potential.

Forest Service Response

83-19 The Washakie Needles Analysis Area is within the wilderness and wildlife habitat improvement projects are limited to restoration of areas that were degraded by man's activities.

Comment 83

Forest Service Response

J-4 Where is the analysis for Warhouse Area 068?
These area is crucial bighorn range. Recent cattle use is of concern due to competative overlap in diet and vulnerability of sheep to mortality on livestock grazed ranges due to secondary impact. **20**

83-20 The Eleanor and Warhouse Analysis Areas, (058 and 068) are analyzed together in Appendix J. Domestic livestock grazing has been eliminated from these areas and all forage is allocated to wildlife and recreational stock.

J-214 How is all sheep feed reserved?
Secondly - the Dunn Creek area is in need of
1. livestock management
2. range site treatment
3. Bighorn sheep range protection + pastures
The grazing system on that area cannot work; the fences or towns, the base of Jim mountain where sheep ~~this~~ use should be high is consistently livestock overgrazed most years. What is the follow up management after range improvements? What is the monitoring process to ensure all goals are met. **21**

83-21 See response to comments 83-10 and 98-2. The Wapiti District is aware of the fence conditions on the Dunn Creek Allotment, and with the cooperation of the new permittee, these structures will be reconstructed.

Short range plans are for each Ranger District to conduct a minimum of two range analyses each year and two updated Range Management Allotment Plans. Based on allotment analyses, any major changes proposed to either reduce or incease domestic livestock stocking and/or wildlife herd quotas on an allotment will follow prescribed Forest Service Manual procedures before implementation can take place.

J-196 Is there any opportunity for improving sheep winter range via burning etc. If so, please state **22**

83-22 There are opportunities to improve sheep winter range through burning but the suggested areas were not scheduled in the first decade due to other areas having higher priority.

Comment 83

Other Comments
DEIS Page III-36 Table III-13

Why are 1980 Comprehensive Wildlife management Plan for National Forest System lands in Wyoming - Goals used for this Forest Plan instead of updated (via letter date) Wyoming Game and Fish Department Strategic Plan Goals from 1984. You are using dated information and saying these are 1984 goals.

Are the proposals of the 1980 document above mentioned included in this Forest Plan? Have they been implemented? When is this 1980 document to be revised to reflect Forest Planning Effort? **23**

DEIS Page III-51

You cannot have 80% use on bluegrass without substantial damage and mortality of desirable species such as green needlegrass or columbian needle grass etc. **24**

If topography is the major problem for grazing management - key areas should be in riparian zones not upland range sites. Riparian overstory and understory should be key species for indicating range use. **25**

Section III Table IV-1 and III-6

Utilization standards should be maximum utilization measurement without a 10% fudge factor which will become your long-term utilization rate. Utilization set rates should not be exceeded. **26**

Forest Service Response

83-23 Table III-13 in the DEIS was for comparison purposes. What is important is that Wyoming Game and Fish population objectives that were used was completed in 1985.

83-24 This standard applies to bottoms that are solid bluegrass. Note that for "others" use can only go to 55-65 ot 40-50 percent. This standard and guideline is in the Plan rather than the DEIS.

83-25 Key grazing areas are identified in each allotment management plan for utilization monitoring.

83-26 Utilization is never totally uniform. Proper utilization is achieved when within the ten percent range, not necessarily the upper limit.

Comment 83

EPD-83-W-L-C 10

... Thank you for your time and effort. The document is much to long and complex for me to adequately address all concerns. My ignorance of your format and planning requirement hinders my ability to comment in a manner convenient for you to respond. I apologize for that. Thanx

Sincerely yours,

Jeff Denton

Comment 84

Forest Service Response

RECEIVED OCT 1 1985

FPD - 84 - P - L - E
Proj. No. Orig Type Area

Wyoming Heritage Society

P.O. Box 2065
1220 Sunshine Ave., Cody, Wyoming 82414
307-587-5681

September 30, 1985

STEERING COMMITTEE
Robert L. Baker, Dubois
James A. Barlow, Jr., Casper
James D. Collums, Casper
Percy M. Cooper, Casper
David Flitner, Craybull
David B. Fuller, Parkman
Robert F. Gosman, Casper
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Leonard Hay, Rock Springs
Harold Hollbaum, Chugwater
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David Johnson, Cheyenne
Lee Keith, Buffalo
D. Thomas Kidd, Casper
Ken Kirkbride, Cheyenne
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Tom Thorson, Mills
G. E. Tillman, Gillette
H. A. (Dave) True, Jr., Casper
Walter C. Urbigkit, Jr., Cheyenne
John Wold, Casper
EXECUTIVE DIRECTOR
Harry Roberts, Cody
ASSISTANT DIRECTOR
Bobette Brown
139 West 2nd St
Casper, WY 82601
265 5462

Mr. Steven P. Mealey
Forest Supervisor
Shoshone National Forest
P.O. Box 2140
Cody, Wyoming 82414

Dear Mr. Mealey:

We have reviewed the proposed Land and Resource Management Plan for the Shoshone National Forest and would commend the forest service for the innovative report.

We would suggest however, that for the final plan additional input be solicited from Wyoming legislative committees and state officials. Certainly consultations with the Department of Environmental Quality and the Game and Fish Department are valid inputs but they are agencies whose actual objectives and activities tend toward the suppression of multiple use and economic development. 1a

It's important to keep in mind that the Shoshone National Forest is three-fourths the size of Connecticut and three times the size of the state of Rhode Island. The forest, which is totally enclosed within the boundaries of the State of Wyoming, is an essential part of Wyoming's economic base which includes multiple use activities such as oil and gas, grazing, timber production, outfitting and tourism.

When looked at in the perspective of what's important to the state,and the future economy of Wyoming there isn't one single page in the proposed plan which represents an official position on the part of the State of Wyoming on the plan's impact on Wyoming's economic base.

Wyoming's economy is dependent upon all the public lands within its borders. More than sixty percent of the crude oil comes from public lands. Approximately eighty percent of the ranches have leases on public lands. Ninety percent of the timber produced in the state comes from public land and an estimated ninety-five percent of the tourists go either to Teton or Yellowstone National Park.

84-1a Copies were sent to the State Clearinghouse for distribution to a variety of agencies. See also the list of agencies and officials to whom the EIS and Plan were mailed (the last section of this chapter).

Comment 84

Forest Service Response

FPD - 84 - F - L - E
Proj. No. Orig Type Affil

The Shoshone National Forest, as a part of that public land matrix, plays an essential role in our economy. Any new rules or proposals or regulatory procedures that further restrict timber production, the development of mineral resources, grazing or outfitting could be the start of a progression of additional restrictions in future plans. When treated separately from the other public lands the impact of curbing multiple use activity in the Shoshone National Forest may not seem that important. But as one forest or BLM plan follows another, the restraints imposed become cumulative. So restrictions as proposed in the recommended alternative in this plan when added to the restrictions proposed in alternatives in other plans, we end up with a composite that could be harmful to Wyoming's economy.

What happens in the Shoshone National Forest plan has a bearing on all the other plans that are presently in progress for other public lands within our state.

Federal planning legislation calls for consultation and working with state and local planners. However, there is no mandate or Congressional authorization for Wyoming input into the planning process, on a equal basis to that of the federal government. The State's input is pretty well restricted to consultations and hearing comments. Until such time as the larger public land states are given a greater planning responsibility, it is incumbent upon the federal agencies to recognize the lack of state planning input and to fully consider the cumulative impact of their planning on the state's economy. Without official state input in this type of planning equal to that of the federal government, single interest groups could play an over powering role to the detriment of the multiple use and sustained yield philosophy that has been mandated by the Congress in public land management.

Every single interest group has a right to be heard. However, the federal agencies who are presently responsible for the planning must also think in the context of what's in the best interest of the State of Wyoming, rather than simply react to either local pressures or to those who might oppose multiple use and sustained yield.

In conclusion, the reduction of existing jobs in the Shoshone National Forest as a result of your planning should not be treated lightly. Replacing those same jobs in the present economy will not be easy.

1

Sincerely,

Harry Roberts
Executive Director

HR/lb

84-1 The effects of the proposed action and alternatives to that action on the economy of the region were analyzed with a state-of-the-art input-output model. This model examined each sector of the economy and the effects of each alternative on each sector in terms of number of jobs, personal income, property income, and unemployment. This analysis indicates that the preferred alternative creates approximately 300 more jobs than if current management were to continue. While it is important to consider local and State interests, National interests must be kept in mind as well. See also Chapter IV of the EIS under Economic Effects and Social Effects.

Comment 85

RECEIVED 1 1985

FPD-85-10-1-F
Proj. No. Orig Type Affil

PARK COUNTY RESOURCE COUNCIL

Post Office Box 2685 Cody, Wyoming 82414

Sept. 29, 1985

Stephen P. Mealey, Supervisor
Shoshone National Forest
P.O. Box 2140
Cody, Wyo. 82414

Dear Mr. Mealey:

The Park County Resource Council would like to make the following comments concerning the Shoshone National Forest plan:

1.) Continue to manage the Clarks Fork Canyon to maintain its eligibility for wild and scenic status | 1

2.) Minimize the issuance of oil and gas leases in sensitive areas and manage in favor of wildlife and not the oil companies | 2

3.) Cut back on the proposed road building and be more specific on road closures or possible reclamation of roads in sensitive areas | 3

4.) Issue new information on timbering that would reflect the recent changes in some areas, specifically the Greybull River and Wood River area | 4

5.) Be more aware of the integrity of the Greater Yellowstone Ecosystem and try to manage the Forest with that in mind | 5

6.) Be more inclined toward alternative C which would not assume all the benfits alternative D would from timbering and road building | 6

Generally, the Park County Resource Council feels the Forest Plan may be influenced, down the road, by budgetary laziness as well as pressure from various industries. The plan, as it stands, with some changes of emphasis, is not unacceptable. It is a complex and difficult subject but we cannot afford to deal lightly with one of the last truly great areas of wilderness and beauty.

Thank you for the opportunity to comment and we will continue to do so as the process continues.

Sincerely,
John G. McGee
Secretary

VI-250

pages tightly bound

Forest Service Response

85-1 The Proposed Plan incorrectly states that we can apply for an extension of the protection period for the River. It is contingent upon an act of Congress to protect the River either by including it in the Wild and Scenic River System or by providing additional temporary protection. It is uncertain at this point whether the Clarks Fork of the Yellowstone River will become a part of the National Wild and Scenic Rivers system. The Forest Service and the Administration are in favor of the River's inclusion. Management activities that are within the discretion of the Forest Service will be designed to maintain the River's eligibility. Other activities that are presently within the discretion of agencies such as BLM (minerals) or Federal Energy Regulatory Commission (hydropower development) could affect eligibility characteristics of the Clarks Fork. In the event such developments are proposed, we would recommend denial to the appropriate agency, until Congress acts. See also response to comment 97-1a.

85-2 The General Mining Laws guide what can or cannot be withdrawn from mineral entry and under what conditions. We direct your attention specifically to Plan, Chapter III in the blue pages under Mining Law Compliance and Administration (General Direction 1C and 2) and Minerals Management Oil and Gas and Geothermal (General Direction 1). All direction found under Minerals Management, supplemented by Plan Appendix K, is intended to protect existing and proposed uses of the land for other resources thereby avoiding the need for withdrawal. If exceptional situations arise, or existing direction is shown to be insufficient, the option of withdrawal remains.

Mineral operations are by law, a viable use of public land. Our charter, provided by Congressional action, is to manage first according to law, and not strictly according to variable market pressures. The mining laws stipulate that lease applications can be made and must be considered for lands not withdrawn. The Forest Plan was selected in large part because it allows mineral activities while recognizing and maintaining the values of clean water, stable wildlife populations, and recreation opportunities which are of primary importance to many Forest users. The Forest Plan affords adequate protection of popular recreation areas, critical wildlife habitat, and other such resource values through application of stipulations and recommended operating procedures. Protection may be in the form of seasonal restrictions or no-surface-occupancy stipulations (see Appendix K of the Plan).

One consideration here is that a lease may never result in actual drilling activity; historically, a low percentage of leases are explored or developed, due in part to market fluctuations and uncertainties.

85-3 In response to numerous concerns, the number of acres managed for timber harvest and the resultant amount of roads has been reduced in the final Plan. In the next fifty years, the Plan projects only eighty miles of new road which will be open to the public. There is projected 120 miles of existing road which will be improved and remain open to the public. An additional 150 miles of new road, and 255 miles of reconstructed existing roads are projected to be closed to the public within the 50 year period. Road construction and reconstruction figures have been corrected. See also response to comments 182-5, 33-9, 80-5, and 44-46.

85-4 The Forest Plan contains information on timber harvest plans for the Greybull and Wood River areas. See Appendix J for Analysis Areas Deer-Dick-Timber, Gooseberry-Guard Station and Wood River. Guidelines by which these areas will be harvested are in Chapter III of the Plan.

85-5 See response to comment 24-1.

Comment 86

Forest Service Response

RECEIVED OCT 1 1985

FPD - 86 - F - L - E
Proj. No. Orig. Type Affil

Box 1535
Lander, Wyoming 82520
September 30, 1985

Forest Supervisor
Shoshone National Forest
Post Office Box 2140
Cody, Wyoming 82414

Subject: Proposed Forest Plan

Dear Sir:

I have read the proposed Plan for the Shoshone and the DEIS, plus all the summaries as well as many reviews and comments prepared by others. The documents prepared by your office are well thought out and presented in a readable manner, if a person has the time and stamina and space to lay the whole Plan out for study and cross-checking the many references. I realize that the Forest covers a very large area and that management practices are complex, and particularly their interactions environmentally and economically. Nevertheless, the Plan is too complicated to be easily understood by non-planners or some one who is not a Forester.

My specific comments on the Plan are as follow:

1. Forest Service Bias

Actually, all of my comments could be included under this heading. In the DEIS and the PLAN practically all alternatives and management prescriptions are tied to timbering and the attendant road construction.

The theme seems to be that without timbering and more roads there will be less water, recreation and wildlife. Is there an alternative or a management prescription that lets water, recreation and wildlife stand on their own merits? An alternative that addresses managing the Shoshone for wildlife, water, soil, recreation, grazing and a modified timber harvest limited to firewood, poles, house logs and small timber operators should be presented.

In the documents provided for review and comment it is obvious that the planners were Forest Planners, and did not have the wide range of expertise necessary to address the issues of recreation, wildlife and other resources as they relate to Forest management. This discrepancy should be addressed in the final Plan.

continued....

1 86-1 See response to comment 44-1.

Comment 86

Forest Service Response

FPD- 86 - F - L - E
Proj. No. Orig Type Appl

2. Wildlife

Indicator species are a very important aspect of planning. Indicator species should be identified for all major habitat types and the Plan must be modified so that the habitat is maintained to protect those species.

Indicator species should be identified for alpine lakes (insects and fish indicators) riparian habitat, mature lodgepole stands, meadows and other habitat types that are important to non-game as well as game species. Planning Problem #2 states that various acreages will be treated for wildlife purposes. Alternative E - Reduced Budget states that there will be a decrease in wildlife under this alternative. Historically there has been greater numbers of wildlife in the forests. Those numbers have declined since man has kept crowding wildlife into smaller and smaller corners of this land of ours. How then can you justify smaller numbers of wildlife in an area where man's activities and numbers will be substantially reduced? What are the projected wildlife population declines or increases by management area? 2

86-2 Additional information on the effects on wildlife indicator species by alternative is presented in EIS Chapter IV Table IV-16.

3. Acid Rain

How will your plan be modified if acid rain is found to be a problem of much greater significance than it is now considered to be by some sources? 3

86-3 The Forest Service presently is very aware of the potentially significant and tragic consequences of acid deposition. There is a growing body of literature attesting to the effects on water quality, aquatic life, and vegetation. Accordingly, the Forest Service Manual currently provides direction for monitoring of air resources, prevention of wilderness resource degradation by air pollution, and pollution abatement. This diretion is incorporated into the Forest Plan. We do not, therefore, envision any change in the Plan, as such. Instead, we expect that this concern would become a more prominent issue as time goes on, and that there will be greater public scrutiny of our efforts to avoid the impacts of acid pollution. At the present time, we are embarking on a long term monitoring plan, in association with the Bridger-Teton National Forest to develop data for the above stated purposes. Implementation of the Forest Plan will enhance this effort and expand it in scope.

4. Wind River Indian Reservation

How will your plan be modified if the preferred alternative management practices are found to be detrimental to the social and economic well-being of the tribal members? 4

86-4 The Forest took appropriate steps to inform and consult with the Indian Reservation, initially through the scoping process then through document mailings and informal contacts. See Chapter VI, Consultation in the EIS.

5. Recreation

What are your assumptions concerning the relationship between road construction/timbering and trail oriented recreation? 5

86-5 See response to comment 44-46.

6. Wilderness

There are several instances where timber harvest will be permitted up to the boundary of a wilderness area. How does this action protect the visual integrity of the wilderness? How do you plan to protect this aspect of wilderness lands? 6

86-6 Visual quality objectives for nonwilderness lands are established based on recreation needs and resource objectives for all surrounding lands. Projects in all areas of the Forest are designed to attempt to achieve designated visual quality objectives.

7. Multiple Use

Given the wide range of uses on the Shoshone Forest and their 7

Continued.....

Comment 86

FPD - 86 - F - L - E -
Proj. No. Orig Type Ltr

Forest Supervisor
Shoshone National Forest
September 30, 1985
Page 3

7. Multiple Use (Continued)

effect on local, state and national economies and social activities, please address the various dollar values associated with the following activities:

Activity	Dollar Values Local	State	National
Wilderness experience	$_____	$_____	$_____
Camping	_____	_____	_____
Hunting	_____	_____	_____
Birding	_____	_____	_____
Hiking	_____	_____	_____
Recreation	_____	_____	_____
Water	_____	_____	_____
Soil	_____	_____	_____
Clean air	_____	_____	_____
Grazing	_____	_____	_____
Timber	_____	_____	_____

I realize that some of the above are very esoteric and difficult to evaluate. However, in the case of wilderness, the people of this nation value it highly even if they never see it or set foot on it! Their values range from knowing that lands, wildlife and other resources will be protected for themselves and future generations. This is a value-oriented resource and must be given weight in any multiple use planning effort.

In conclusion, my greatest concern is that the documents presented for review and comment are extremely biased toward the production of timber and road construction. Multiple use planning, values, and alternatives are not clearly nor adequately stated. Budget and staffing patterns (by the type of expertise required) should also be stated for the alternative finally identified as appropriate for the Shoshone National Forest.

Thank you for the opportunity to make these comments.

Sincerely,

Robert L. Means
Board Member
Wyoming Outdoor Council

7

8

Forest Service Response

86-7 For each activity or output from a Forest, there are two kinds of economic values that can be assigned. The first is the "purchase" price for that output or activity. Such purchase prices are used in economic efficiency analysis. For goods and services such as timber, for which there is a market, the market price is used in this type of analysis. For other goods and services where there is no market, a surrogate value is used. In Forest Planning, this value is a "willingness to pay" value representing what an average user would be willing to pay for such things as a day of hiking in a wilderness or a day of big game hunting. These values for all goods and services included in analysis of the Forest Plan can be found tabulated in Appendix B of the EIS.

The second type of value is the impact on an economy through production of a good or service. This is represented by such measures as direct, indirect and induced personal income and property income as well as direct, indirect and induced new jobs in the economy. In other words, there are nine "values" included in this measure and not all are represented in dollar values. These values were estimated for each alternative based on the total amount of all goods and services produced by that alternative by economic impact area. Results of this analysis are included in Chapter II and IV of the EIS and the procedure and analysis tool used for this is discussed in Appendix B to the EIS. Specific effects by catagory of output are included in planning records and the commenter is invited to inspect those at the Supervisor's office in Cody.

86-8 See response to comment 44-46. The budget by resource area is presented in the FEIS in Table II-10.

Comment 87

Forest Service Response

RECEIVED ... 1 1985

FPD - 87 - DN - L - E
Proj. No. Orig Type Affil

WYOMING NATIVE PLANT SOCIETY

Box 1471
Cheyenne, WY 82003
September 29, 1985

Stephen P. Mealey, Forest Supervisor
Shoshone National Forest
P.O. Box 2140
225 W. Yellowstone Avenue
Cody, Wyoming 82414

Dear Mr. Mealey:

Our comments on the Proposed Land and Resource Management Plan and DEIS concerns one issue---the omission of the Cathedral Cliffs Wetland Complex from your plan.

It is our opinion that the Cathedral Cliffs Wetland Complex represents a significant, unique, and remarkable ecosystem. The wetland exhibits an unusual, set of topographic and edaphic conditions. The extensive marl deposits, high PH, elevation, and topographic position operate to make this an area of extraordinary ecological and botanical interest. The Cathedral Cliffs Wetland is home to a unique assemblage of over two dozen rare and unusual vascular plant species, most of which have highly discontinuous distributions in North America. Eight of these plant species (Arctostaphylos rubra, Salix myrtillifolia, Primula egaliksensis, Scirpus pumilus, Carex microglochin, C. scirpiformis, Kobresia simpliciuscula and Orchis rotundifolia) are not known to occur else where in Wyoming while two of these species (A. rubra and S. myrtillifolia)are unknown in the lower forty-eight states outside of this locality. These eight species are certainly species of special concern in the state since they occur as far as known only at this site. Whether or not these eight species will become threatened or endangered in the future or maintain viable populations depends, we would imagine in no small part, on how the Cathedral Cliffs Wetland is evaluated, managed, and protected by the Shoshone N.F. 1

We would like to point out that the Cathedral Cliffs Wetland Complex was nominated as deserving special management consideration by no less than four working groups that participated in the Wyoming Natural Area Needs Workshop held in Riverton on November 14 & 15, 1984.

Therefore, we would hope that the Cathedral Cliffs Wetland Complex, an outstanding biological resource of regional significance be given special management consideration.

Sincerely yours,

Erwin P. Evert
Vice-President

VI-254

87-1 Lenard Hendzel, Regional Ecologist reports that past disturbances, inclusion within active cattle allotments, and uses being made of the area by the neighboring dude ranch, preclude establishment as an undisturbed RNA. However, Hendzel does recommend designating the site as a Special Interest Area (SIA). He will work with the District, Forest and the Wyoming Nature Conservancy in preparing an SIA establishment report.

Comment 88

RECEIVED OCT 1 1985

FPD-88-0-E-C
Proj. No. Orig Type Affil

1476 Tyrell
Park Ridge, IL 60068
September 28, 1985

Stephen P. Mealy, Forest Supervisor
Shoshone National Forest
P.O. Box 2140
225 W. Yellowstone Avenue
Cody, Wyoming 82414

Dear Mr. Mealy:

The following are my comments concerning the Proposed Land and Resource Management Plan and DEIS for the Shoshone National Forest.

Basic biological inventory data are lacking for the forest. The proposed Forest Plan does not address this problem or even acknowledge its existence. How can one manage for ecological and biological diversity if this basic base line data is not available? After all, a forest is a community of plants; but even such elementary data as estimated number of vascular plant species comprising this plant community is completely lacking.

RNA's are neglected by the Proposed Forest Plan. The Nezperce N.F., a forest of comparable area (2.2 million acres) and with a comparable amount of wilderness, has designated 8,015 acres as RNA's and proposed 1,710 acres as RNA's while Shoshone N.F. has proposed only 1,682 acres as RNA's out of 2.4 million acres. Many additional RNA recommendations have been made concerning the Shoshone N.F. in Collins, E.I. 1985, Wyoming Natural Area Needs Workshop Proceedings. This document is not referred to or cited in the Proposed Forest Plan references. 2

Research needs for the Shoshone N.F. for the next fifty years are not mentioned in the Proposed Forest Plan or DEIS. The Nezperce Forest has identified at least 13 research needs on pp. 11-14 of their Proposed Forest Plan. 3

Degradation of biological and visual assets, according to Shoshone N.F. Interim Management guidelines, are taking place in the Washakie and North Absaroka Wilderness area particularly around campsites, in meadows, and in riparian areas. Neither the Proposed Forest Plan or DEIS adequately indicates how resources and funds (if any) will be used to alleviate or rectify these problems. It seems that management of about 60% of the Shoshone N.F. (the wilderness areas) has been eliminated. 4

Too much management emphasis is placed on too few species—Bighorn Sheep, Elk, Grizzly Bear, and a handful of tree species rather than on an ecosystem management approach. Are only those things that generate money or jobs important and worthy of management? 5

Creation of future jobs and services seems to be a primary objective of the Proposed Forest Plan. 6

Forest Service Response

88-2 Although there are no research natural areas (RNA) on the Shoshone North Fork at this time, two of five areas proposed for designation (Twin Lakes and Sawtooth) in the preferred alternative were proposed in the Beartooth Plateau Unit Plan, completed on November 26, 1980. Work necessary for designation has been underway for some time. Other RNA's may be designated in the future after the five priority areas identified in the plan are established.

The Sawtooth peat beds area is considered unique because of its location; it is the only known area of permafrost with a peat deposit this far south in the Rocky Mountains. "Unique ecosystem" has been changed to "unique landform" on page II-81 of the Proposed Plan.

The reference in the DEIS (page IV-80) to signing boundaries and law enforcement is derived from Forest Service Manual, section 4063.3. This directs that special closures of RNA's may be necessary to protect such areas from actual or potential harm resulting from public use. Of course, the area must be properly identified before closures can be enforced.

We continue to work toward perfecting the biological inventory of forest resources, and always welcome accurate information supplied by others to help us develop this.

88-3 See response to comment 88-2 Research needs are listed at end of Plan, Chapter II (pages II-95 and 96 of the Proposed Plan).

88-4 We direct your attention to Chapter III of the FEIS. A section has been added under the heading Wetlands and Floodplains. In the introductory portion of that section is a statement quantifying wetland and riparian habitat on the Forest. This quantification is the result of an exhaustive survey of wetlands, lakes and streams on the Forest. We are well into the process of classifying all streams and stream segments using a systematic approach that will facilitate protection and management of riparian areas.

We also direct your attention to Chapter IV of the FEIS, under Wetlands and Floodplains and under the Environmental Effects section of other resources, particularly Range, Wilderness, Minerals and Facilities. We feel that the effects of management in riparian areas, floodplains or wetlands are prominently displayed, albeit not quantitatively.

Because of the potential effects on wetlands and floodplains, as displayed in the EIS, a great deal of management direction was promulgated and prominently displayed in the Forest Plan. This direction incorporates the Executive Orders in question, and it incorporates Forest Service Manual direction (FSM 2520) that relates to all riparian areas, not just trout streams or extensive riparian zones. We urge you to look at the Plan, blue pages, particularly under Wilderness Area Mangement (General Direction 19 through 28), Riparian Area Management, and Water Resource Improvement and Maintenance (General Direction 8). Additionally, please look at Management Prescription 9A in the Plan, yellow pages which is devoted exclusively to management of nonwilderness riparian areas. All such direction is intended for broad application to riparian areas not just "high quality riparian". Unfortunately, the reference in the planning documents to high quality riparian has proved to be confusing. There is no intent to ignore any riparian habitat, wherever or in whatever condition it is found. High quality riparians in the Appendix J context are merely those outstanding or large examples of that ecotype, potentively subject to management activities.

Comment 88

-2- FPD - 88 - 0 - 1 - C
Proj. No. Orig Type Affil

The Proposed Forest Plan indicates that National Forests are managed primarily for the economic benefit of a few special interests such as timber, mining, livestock, and recreation. | 6

The Proposed Forest Plan and DEIS does not emphasize adequately or strongly enough that National Forest lands are to be managed primarily as land trusts for the benefit of all the American people over a long period of time and not for the short term economic benefit of a few special interests.

Since only 144,682 acres or 6% of the forest is suited for commercial timber production (p. D-2 Proposed Forest Plan), why spend an inordinate amount of the forest budget on road building for marginal timber harvests? Road building for future timber harvest should be eliminated from the Shoshone N.F. Existing roads should be used for the very minimal future timber harvests taking place in areas that have been previously harvested. | 9

Proposed habitat and begetational manipulations should be drastically curtailed if not eliminated since practically all manipulation attempts that I known of in Shoshone N.F. have been misdirected or complete failures. | 10

It seems that a blend or combination of Alternatives C (non-commodity) and E (reduced budget) would best serve the land and the long term interests of the American public. This blend, it would seem, would mitigate the disadvantages associated with Alternative E as regards monitoring, research, and law enforcement in relation to the wilderness resource and oil-gas-mineral exploration and development and would reduce short term and long term deleterious management practices. | 11

A SNOTEL site is incorrectly shown on the Management Area Map and on p. J-239 Proposed Forest Plan as being on Clayton Mountain. The SNOTEL site is actually located in Section 19 of T51N R107W about 4 miles SW of Clayton Mtn. | 12

It is stated on p. 43 DEIS summary that "there are no known threatened or endangered plants on the forest." However, the Swamp Lake-Cathedral Cliffs Wetland harbors 8 vascular plant species known to occur no where else in Wyoming. These 8 species and possibly others could easily become threated or endangered because of forest service policies regarding development and management in this area. This fact is not mentioned in the Proposed Forest Plan or in the DEIS. | 13

It should be pointed out that the "Peat Beds and High Mountain Lakes" mentioned on p. J-47 of the Proposed Forest Plan are proposed RNA's not established RNA's as stated. Furthermore, these areas according to p. IV-80 DEIS will only be established contingent upon "funding of research" and "as dictated by priority." | 14

The Proposed Forest Plan makes no mention under special areas in the Ghost Creek management area p. J-28 or anywhere else of the Cathedral Cliffs Wetland Complex located in Sections 11 & 14 of T56N R106W. This site is probably the most unique, unusual and significant locality for rare plants on the Shoshone N.F. and possibly also in all of Region 2. The Cathedral Cliffs Wetland Complex contains 8 vascular plant species known to occur no where else in Wyoming, two of which are known to occur no where else in the lower 48 states. See Collins, E.I. 1985, Wyoming Natural Area Needs Workshop Proceedings, pp. 45, 80, 97, 124, 166, and Evert, E.F. 1983, A Research Natural Area Proposal and Suitability Report for the Cathedral Cliffs Wetland Complex, pp. 1-12 for additional information on this unique site. | 15

Forest Service Response

88-4 (continued) You may be interested in Plan, Appendix G, which is a watershed problem assessment and current listing of project sites stated for improvement. Please note the identification of grazing as a specific problem area, and also note the number of stream (riparian) related projects which we intend to implement.

We agree with the comments that point out a problem with funding for wilderness management. There is indeed a critical need for monitoring use levels and levels of change occuring in wilderness if we are to properly administer the forest direction and prescriptions 8A, 8B and 8C as outlined in the Forest Land and Resource Management Plan. The Plan calls for management actions to be applied if monitoring shows use levels are being exceeded. Unfortunately, funding in wilderness management is not keeping pace with the increased responsibilities directed by the Plan. We share the concern of those commenting on this issue and hope that completion of the Plan will result in adequate increases in funding to accomplish the job or that alternate means of funding will become available.

88-5 See response to comments 24-1.

88-6 It is unclear why the reviewer feels this way. The purpose of the Plan is to manage the Forest in a way that maximizes net public benefit.

88-9 In response to numerous concerns, the number of acres managed for timber harvest and the resultant amount of roads has been reduced in the final Plan. In the next fifty years, the Plan projects only eighty miles of new road which will be open to the public. There is projected 120 miles of existing road which will be improved and remain open to the public. An additional 150 miles of new road, and 255 miles of reconstructed existing roads are projected to be closed to the public within the 50 year period. Road construction and reconstruction figures have been corrected. See also response to comments 182-5, 33-9, 80-5, and 44-46.

88-10 Professionals in wildlife, range, and timber management in the Forest Service and in other agencies do not agree.

88-11 Based on all analysis, the Forest Service believes that Alternative D presents a more balanced mix of Forest uses than Alternative C. Alternative D as a whole responds better to the issues and concerns identified.

88-12 The location has been corrected.

88-13 Lenard Hendzel, Regional Ecologist reports that past disturbances, inclusion within active cattle allotments, and uses being made of the area by the neighboring dude ranch, preclude establishment as an undisturbed RNA. However, Hendzel does recommend designating the site as a Special Interest Area (SIA). He will work with the District, Forest and the Wyoming Nature Conservancy in preparing an SIA establishment report.

88-14 Wording in Appendix J has been corrected.

88-15 See response to 88-13 .

FPD- -88- -0- -1- -0-
Proj. No. Orig Type Affil

Oliver Gulch T56N R107W S16, p. A-3 Proposed Forest Plan---233 acres of spruce on wet-moist substrates are slated for harvest. Occurring in Oliver Gulch under this old growth spruce forest on the same wet-moist substrata and also in nearby Cathedral Cliffs Wetland are a number of remarkable vascular plant species with very restricted distributions in Wyoming such as Orchis rotundifolia, Petasites sagittatus, Carex leptalea, and Carex capillaris. Will these species be extirpated from this portion of their Wyoming range due to habitat changes attendant with the Oliver Gulch timber sale? **16**

Cathedral Cliffs T56N R106W S23, p. A-5 Proposed Forest Plan---At least three miles of new road construction will be required to reach this sale in S23, but this is not indicated. **17**

Laughing Water Creek T53N R105W S's 14, 24, 36, p. A-5 Proposed Forest Plan--- 10 miles of new road construction into steep, largely non-productive land on the eastern slope of the Absarokas for less than 200 acres of virgin Douglas-fir timber is hard to justify even if the ostensible primary justification for road building is for future firewood gathering. Future public access to this area is through highly contested, sensitive private lands which have produced conflicts in the past. Will these conflicts disappear in the future? **18**

Blackwater Creek T51N R107W S's 5, 9, p. A-3 Proposed Forest Plan---4 miles of new road construction for timber harvest is hard to justify anywhere in the **N.Fk.** Shoshone drainage area particularly in this area. Why screw up another delightful area and buffer area for surrounding wilderness for hardly any short term profit for anybody? Again, timber harvest, if any, in the Shoshone N.F. logic should dictate that it should be confined to areas with existing roads. **19**

Some incorrect information appears on p. II-81 of the Proposed Forest Plan concerning Sawtooth Peatbed Proposed RNA where this permafrost associated land form or geomorphological feature is referred to as a "unique ecosystem." Clarification of the significance of this unique land form can be obtained by referring to Collins, E.I. et. al. 1984, Arctic and Alpine Research 16:255-258, which has not been cited in the Proposed Forest Plan references. Equally incorrect and very strange information concerning RNA's appears on p. IV-80 of the DEIS where it is stated that "the research natural areas program includes activities such as signing boundaries, law enforcement." This nonsense should be cleared up by referring to F.S. Manual Series 4000---Research, Section 4063.02-Objective. **20**

I thank you for the opportunity to comment on these documents.

Sincerely yours,

E. F. Evert

Erwin F. Evert

88-16 Selection harvest does not involve significant habitat changes. Microclimates and soil characteristics do not change significantly with a selection harvest system. Therefore, it is not anticipated that any species will be eliminated from the area.

88-17 Any roads needed for timber removal identified in this plan and not shown in Appendix A will be local roads and closed following timber activity.

88-18 Road building and timber harvest in the Laughing Water Creek area have not been included in the Final Plan.

88-19 The Forest Plan shows no extensive timber sales in the Blackwater Creek and Green Creek area. During the first decade the District plans to sell approximately 200 MBF of small Ranger Sales District-wide consisting of post and poles, fuelwood, thinning, house logs, salvage and personal use Christmas trees. The sales in the Blackwater and Green Creek areas will utilize the existing road systems and skid trails. No road construction is anticipated in the first decade.

The area was proposed as 2A to provide access to the Wilderness boundary rather than closing the road one mile away during the summer months. The reader correctly points out the importance of the 5A area for elk management with its seasonal restrictions of vehicular use. There is and will continue to be closures to snowmobiles and other vehicles during the fall-winter-spring season up the entire Elk Fork drainage. Therefore to provide summer access, the area will need to remain 2A, but snowmobiling will not be permitted.

88-20 See response to comment 88-2.

Comment 89

RECEIVED Oct 1 1985

FPD-89-P-L B
Proj. No. Orig Typo Attn

Ishawooa Construction Company

2113 South Fork Road Cody, Wyoming 82414 (307) 587-3868

J. Nichols Patrick

September 29, 1985

Supervisor Stephen P. Mealey
Shoshone National Forest
P.O. Box 2140
Cody, Wyoming 82414

Dear Mr. Mealey:

As a consumer of forest products and a user of the back country, I am very concerned about the proposed plan for the Shoshone National Forest.

I recently visited the Reef Creek timber sale and it would indicate that timber harvest is not the best use of the forest lands adjacent to the wilderness. This is due to three factors: 1

1. Slow regrowth of timber in this climate.
2. Inadequate and irresponsible lumbering practices and supervision.
3. Marginal value and quality of timber harvested.

The top priority should be the conservation and preservation of our dwindling precious resource - wilderness! The greater Yellowstone ecosystem should be managed to benefit wildlife, recreation and scenery. New roads, mineral leasing and timber harvest do not help maintain a wilderness ecosystem. 2

Sincerely yours,

J. Nichols Patrick

JNP:jap

VI-258

Forest Service Response

89-1 Timber harvest levels in the Forest Plan have remained approximately at the level of the proposed Forest Plan. The number of acres proposed for treatment has been reduced. This reduction in acreage reflects less emphasis on steeper, less productive areas (primarily stocked with lodgepole pine) and more emphasis on areas with higher productivity. Harvest levels have been established according to the economic viability of individual areas. Forest standards and guidelines are established which will insure that timber sales will not have adverse effects on wildlife, recreation, water, scenic beauty or other resources.

89-2 The major purposes and responsibilities of the Forest Service are stated primarily in two Federal Laws, the Multiple Use Sustained Yield Act of 1960 and the National Forest Management Act of 1976. These laws clearly direct the Forest Service to provide, as appropriate, on National Forest System lands for all the multiple uses. Accordingly, the goal of Forest Service planning is to produce plans which provide for multiple use and sustained yield of products and services and, in particular, include coordination of outdoor recreation, range, timber, watershed, wildlife and fish and wilderness (16 U.S.C. 1600) in a way that maximizes long-term net public benefits in an environmentally sound manner (36 CFR 219.1). In short, the primary planning goal requires production of goods and services which assures coordination of resources and maximizes net public benefits.

Wilderness is but one of several multiple use values to be provided on the Shoshone. The suitability of the Forest for wilderness has been evaluated with the result that approximately 57% of the Forest's roughly 2.5 million acres have been designated as wilderness. The most recent wilderness additions occurred in 1984 as a result of the Wyoming Wilderness Act. This act also directed the release of nonselected areas for multiple use management. Forest Plan direction for these released areas as well as other multiple use management areas is to emphasize production of non-commodities while maintaining historic levels of production of commodities. This philosophy was chosen in recognition of the value of the Shoshone to the American public in terms of wildlife; high quality, low density recreation; and outstanding scenic values as well as its role in the Greater Yellowstone area. Production of commodities on the Forest as proposed in the Plan, is done under standards which are designed to enhance non-commodities as much as possible. For example, standards for timber harvests including cut block size, dispersion of cuts, density of roads and timber road management are designed to use commerical timber operations to improve cover to forage ratios for wildlife as well as improve the distribution and amount of structural and vegetative diversity in a way that allows for enhanced recreation access to the Forest when appropriate as well as visual diversity. Because all harvests in the Plan are above cost sales, they provide a mechanism for improving vegetative communities on the Forest, improving wildlife habitat and improving recreational opportunities in a very cost efficient manner. See also response to comment 44-46.

Comment 90

Forest Service Response

RECEIVED Oct. 2 1985

FSD-70-0-1-C
Proj. No. Orig Type Addl

1030 Hemlock Way
Broomfield, Colorado 80020
September 29, 1985

Mr. Stephen P. Mealey
Shoshone National Forest
P. O. Box 2140
Cody, Wyoming 82414

Dear Mr. Mealey:

I am writing to comment on the Shoshone National Forest Plan. I support your recommendations to manage the Clark Fork River so as to maintain its eligibility for wild and scenic status and to withdraw all wilderness and critical grizzly bear habitat from oil and gas development. **3**

I would also encourage you to ensure that the final plan has as its highest priorities; (1) The preservation of wildlife and scenery and, (2) The health of the Greater Yellowstone ecosystem. If this requires the reduction or elimination of timber sales from critical wildlife habitat and the elimination of roads into roadless areas, so be it. **1**

I sincerely believe that the monetary and esthetic value of wildlife, recreation and scenery in our National forests far outweigh the monetary value of harvested timber and I would really like to see forest plans recognize and reflect this value. **2**

I appreciate the opportunity to participate in your forest plan process.

Sincerely yours,

Joseph J. Krieg

90-1 The preferred alternative has wildlife and recreation as the highest priorities. It is not designed to take away habitat. Nonwildlife and nonrecreational uses of the Forest are controlled with standards and guidelines for operations such that recreation and wildlife do not suffer. Refer also to response to comments 24-1, 33-4, 182-37, 44-46, and 44-43.

90-2 See response to comments 44-7, 44-17, and 139-1.

90-3 See response to comments 68-8, 51-3, and 13-1.

Comment 91

RECEIVED Oct 2 1985

FPD-91-0-1-0
Proj. No. Orig Type Affil

6224 Powell Road
Parker, Colorado 80134

September 30, 1985

Mr. Stephen P. Mealey
Forest Supervisor
Shoshone National Forest
P. O. Box 2140
Cody, Wyoming 82414

Dear Mr. Mealey:

I am writing you to comment on the proposed Shoshone National Forest Plan.

As one who hikes, backbacks and fishes in the Shoshone National Forest I feel there are several sections of the Plan that could be improved. I feel the increase in the timber harvest could have a negative impact on the Greater Yellowstone Ecosystem. The Plan calls for 665 miles of new roads in the next 50 years. Much of this construction is planned in roadless areas, wildlife habitat and elk migration routes. Over 101,000 acres are listed as suitable for timber harvest. I believe that this should be reduced to minimize impacts on wildlife. I also feel there is an inadequate range of alternatives from which to compare management options. 1 2

I would like to see the Forest managed in a way that would enhance the health of the Greater Yellowstone Ecosystem. Wildlife should be managed to achieve 100% of population objectives. This means elimination of timber sales from critical grizzly bear habitat and elimination of plans to road any presently unroaded areas. The areas that should be protected from new roads and timber sales include Deep Lake, Dunoir Valley, Sawmill Creek, North of Sinks Canyon, lands surrounding Northen Meadows, Fiddlers Lake to Christina Lake, and areas surrounding wilderness areas and Yellowstone National Park. I feel any conflicts between wildlife and other Forest users should be resolved in favor of wildlife. 3 4 5 6

I support the Forest Service recommendations to manage the Clark Fork River to maintain its eligibility for Wild and Scenic status and to withdraw all wilderness and critical grizzly bear habitat from oil and gas development. I feel lands surrounding Washakie, North Absaroka and Absaroka-Beartooth wilderness areas should also be given protection from oil and gas development. 8 7

I have enjoyed visiting the Shoshone National Forest and thank you for the opportunity to comment on the proposed Plan.

Very truly yours,

Lawrence A. Papp

Lawrence A. Papp

Forest Service Response

91-1 See response to comments 24-1 and 33-4.

91-2 See response to comment 44-1.

91-3 See response to comment 24-1.

91-4 See response to comment 59-46.

91-5 It is recognized that disturbance activities such as timber sales can displace grizzly bears and potentially increase the risk of bear mortalities. Mitigation measures such as provisions for adjacent security areas and stringent controls on timing and administration of activities will be incorporated as necessary in timber sales. As indicated, logging can improve the quality and quantity of bear foods.

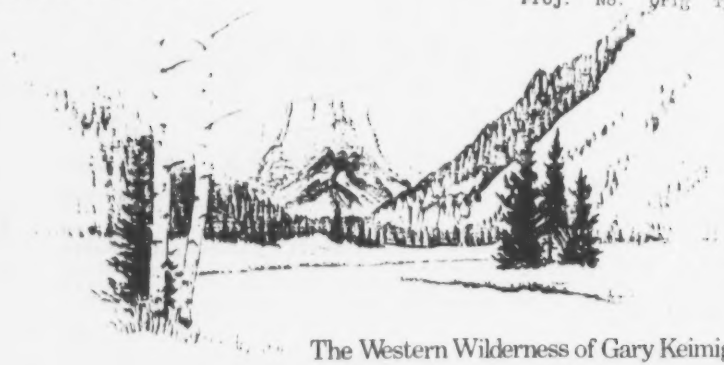
91-6 See response to comment 51-5.

91-7 See response to comments 8-9, 68-8, and 35-4.

91-8 See response to comments 13-1, 68-8, and 51-3.

RECEIVED OCT 2 1985

FPD-92-F-L-B
Proj. No. Orig Type Affil



The Western Wilderness of Gary Keimig

WILDLIFE • WESTERN LANDSCAPE • NATURE
ART • ILLUSTRATION

September 30, 1985

Shoshone National Forest
Cody Wyoming

I don't have any major objections to the Forest Plan in that it allows for re-evaluations as time goes on. I am a little concerned in that I think the over all plan seems to favor the logging industry over wildlife considerations. Particularly north native is the Five and Six Mile Creek area of the Absaroka. This area is an extremely critical area for Elk. Calving in the spring and fall migration. There is a good resident elk herd utilizing this area and many winters find elk using the area as a wintering area. I believe extreme caution should be used in determining the effects of logging and the proposed Brent Creek Road will have on this area.

1

I do object to Oil & Gas exploration in the majority of the National Forest. Multiple use or not, I will never be convinced that the cost of such a resource can outweigh the importance of the Wildlife and aesthetic values that will be of even more and increasing importance as time goes on. I have no problem with the idea that the land can be for the most part restored to its original character after exploration. I am worried about what happens if something is discovered. It would definitely alter this country for a very long time. Our Oil & Gas people have never told us of such consequences. If we are at the point of having to find oil & Gas in the Shoshone, to support our country then possibly we are already too late in developing an alternate energy source.

2

Thank you.

Gary J Keimig

BOX 945 DUBOIS WYOMING 82513 PHONE AC 307 455 2932

92-1 In the 1984 Wyoming Wilderness Act, Congress directed that nonselected roadless areas be released for multiple use purposes, and that "buffer areas" were not to be considered adjacent to wilderness. With this in mind, the Wolf Creek timber sale has been included in the Forest Plan. Planned sales between Five Mile Creek and the Dunoir Special Management Unit have not been included in the Forest Plan; this has been allocated to Management Area 3A rather than Management Area 7E. No logging or road building will take place in the Dunoir Special Management Unit. See also response to comment 44-46.

92-2 The General Mining Laws guide what can or cannot be withdrawn from minerals entry and under what conditions. We direct your attention specifically to Plan, Chapter III in the blue pages under Mining Law Compliance and Administration (General Direction 1C and 2) and Minerals Management Oil and Gas and Geothermal (General Direction 1). All direction found under Minerals Management, supplemented by Plan Appendix K, is intended to protect existing and proposed uses of the land for other resources thereby avoiding the need for withdrawal. If exceptional situations arise, or existing direction is shown to be insufficient, the option of withdrawal remains.

Minerals operations are by law, a viable use of public land. Our charter, provided by congressional action, is to manage first according to law, and not strictly according to variable market pressures. The mining laws stipulate that lease applications can be made and must be considered for lands not withdrawn. The Forest Plan alternative was selected in large part because it allows mineral activities while recognizing and maintaining the esthetic value of clean water, stable wildlife populations, and recreation opportunities which are of primary importance to many Forest users. Appendix K of the Forest Plan affords adequate protection of popular recreation areas, critical wildlife habitat, and other such resource values through application of stipulations and recommended operating procedures. Protection may be in the form of seasonal restrictions or "no surface occupancy" stipulations.

One consideration here is that a lease may never result in actual drilling activity; historically, a low percentage of leases are explored as developed, due in part to market fluctuations and uncertainties.

The Errata sheet to Proposed Plan Appendix K and Appendix K of the Forest Plan outlines the process for developing lease recommendations. Lease recommendations consist of a set of stipulations and recommended operating procedures which are deemed as possibly necessary to meet the objectives of the Plan for other resources. Actual exploration and development proposals require additional environmental analysis and determination of cumulative effects that could result in a cap on activities within a given area. This determination would include wildlife population objectives within a herd unit, or other resource objectives affected by incremental development through time.

Comment 93

Forest Service Response

RECEIVED OCT 2 1985

FPD-93-W-L-C
Proj. No. Orig Type Appl

September 30, 1985
306 E. Jefferson Road
Cheyenne, Wyoming 82007

Stephen P. Mealey
Forest Supervisor
Shoshone National Forest
Box 2140
Cody, Wyoming 82414

Dear Mr. Mealey:

I would like to add my support to the Shoshone National Forest plan which calls for continued protection of the Clarks Fork River in its natural state. I believe this river should remain eligible for the National Wild and Scenic River System. I believe this would represent the best use of the river and its environment. 1

Also, I support a management plan which would manage the Forest with the health of the Greater Yellowstone ecosystem and the preservation of the wildlife, recreation, and scenery as the highest priorities. Thank you for considering my opinion. 2

Sincerely,

Michael C. Berry

xc: James Torrence, Regional Forester
R. Max Peterson, Chief, US Forest Service

93-1 The Draft Plan incorrectly states that we can apply for an extension of the protection period for the River. It is contingent upon an Act of Congress to protect the River either by including it in the Wild and Scenic River System or by providing additional temporary protection. It is uncertain at this point whether the Clarks Fork of the Yellowstone River will become a part of the National Wild and Scenic Rivers system. The Forest Service and the administration are in favor of the River's inclusion. Management activities that are within the discretion of the Forest Service will be designed to maintain the River's eligibility. Other activities that are presently within the discretion of agencies such as BLM (minerals) or FERC (hydropower development) could affect eligibility characteristics of the Clarks Fork. In the event such developments are proposed, we would recommend denial to the appropriate agency, until Congress acts. See also response to comment 97-1a.

93-2 See response to comment 24-1.

Comment 94

RECEIVED OCT 2 1985

Box 1354

[illegible] - 94 - [illegible] - [illegible] - Jackson Wyo
Proj. No. Orig Type Affil 83001

Supervisor Stephen P Mealey
Shoshone National Forest
P O Box 2140
Cody Wyo. 82414

9/29/85

Dear Sir:

This is to support your recomendation to Manage the Clarks Forks River to Maintain its eligibility for Wild and scenic status. 1

It seems important also to Withdraw all wilderness and Critical grizzly bear habitat from oil & gas development as you know if these lands are once leased the future and health of the Greater Yellowstone ecosystem is weakened for ever. Timber sales, road building or any development in this area will conflict with Wildlife and reduce the potential for Wilderness designation 2

Sincerely
Jack F Welch 3

Forest Service Response

94-1 The Draft Plan incorrectly states that we can apply for an extension of the protection period for the River. It is contingent upon an Act of Congress to protect the River either by including it in the Wild and Scenic River System or by providing additional temporary protection. It is uncertain at this point whether the Clarks Fork of the Yellowstone River will become a part of the National Wild and Scenic Rivers system. The Forest Service and the administration are in favor of the River's inclusion. Management activities that are within the discretion of the Forest Service will be designed to maintain the River's eligibility. Other activities that are presently within the discretion of agencies such as BLM (minerals) or FERC (hydropower development) could affect eligibility characteristics of the Clarks Fork. In the event such developments are proposed, we would recommend denial to the appropriate agency, until Congress acts. See also response to comment 97-1a.

94-2 See response to comments 68-8 and 24-1.

94-3 In the 1984 Wyoming Wilderness Act, Congress directed that nonselected roadless areas be released for multiple use purposes, and that "buffer areas" were not to be considered adjacent to Wilderness. With this legal direction in mind, some timber sales and the accompanying roads have been scheduled in roadless areas, while other currently roadless areas have not been scheduled. See also rsponse to comments 182-5 and 44-46.

Comment 95

Forest Service Response

RECEIVED ... 2 1985

FRD-95-W-L-C
Proj. No. Orig Type Afil

Sept. 30 1985
FRD-95-W-L-C
Proj. No. Orig Type Afil

Dear Supervisor Mealey,

Wyoming has been my home for the past 25 years and I've seen many changes - some good, some bad. Anything that takes away habitat from our wonderful unique wildlife is bad. The Shoshone National Forest plan is obviously designed to do this through new roads & increased timber sales. 1

I urge you to use your influence to protect wildlife habitat in your forest.

Sincerely,
Sally Deterich

720 So. 10th St.
Laramie, Wyo 82070

VT-264

95-1 The preferred alternative has wildlife and recreation as the highest priorities. It is not designed to take away habitat. Nonwildlife and nonrecreational uses of the Forest are controlled with standards and guidelines for operations such that recreation and wildlife do not suffer. Refer also to response to comments 24-1, 33-4, 182-37, 44-46, and 44-43.

Adequate protection measures for the grizzly are in the Grizzly Bear Guidelines and in Standards and Guidelines. Site-specific projects will be analyzed in accordance with NEPA and the ESA.

Comment 96

RECEIVED OCT 2 1985

FPD-96-P-L C
Proj. No. Orig Type Affil

101 Lower Southfork Rd.
Cody, Wy 82414
September 30, 1985

Stephen P. Mealey, Forest Supervisor
Shoshone National Forest
P.O. Box 2140
Cody, Wy 82414

Regarding: Fifty Year Proposed Forest Plan

Dear Mr. Mealey:

Of the six alternatives we favor Alternative D, the same as the Forest Service. It continues to emphasize multiple use and maintains support for the commodities, such as timbering, grazing, and mineral, as well as, increased demand by recreation, wildlife habitat and protection.

Since we have a cattle grazing permit on the Belnap Allotment, #131, we are especially interested in that unit. We are in agreement with your proposed plan. It allows that good lumber to be harvested leaving more vegetation and habitat for the wildlife. The sage brush burning has been very successful in improving forage for both wildlife and livestock. For several years the seismic activity in this unit did not greatly disturb the domestic livestock or wildlife, and the wildlife has been as plentiful as ever. I believe the access road to Carter Mountain has benefited recreation as much as timber, mineral, and grazing. Many people are not equiped and physically able to hunt or hike in the forest, where an occasional road does allow people to drive to and enjoy the forest. Therefore, we approve of your proposed plan in this unit.

We fell the forest service personel have been cooperative, courteous, and thorough in being good stewards for the U. S. Forest Service.

Our concern is the cost involved in doing this study and the time involved by the staff when they are trained to work in the field. 1

Another Concern is the pressure put on you by the enviromental groups, who take for granite the availability of the commodities that you try to help by maintaining the multiple use concept. Hang tough and don't let them push you off balance. Keep a balance. Remember the silent majority does not usually respond to such issues. We usually don't, but felt the time has come when we should.

Sincerely,

[illegible]

Forest Service Response

96-1 The preparation of a forest plan is mandated by law, as are the basic procedures which must be followed in preparing it. It is recognized that the costs in terms of money and time are high in the short-run; but in the long run, the plan will allow forest staff to better utilize their time in the field.

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Forest Service Response

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STATE OF WYOMING
OFFICE OF THE GOVERNOR
CHEYENNE 82002

ED HERSCHLER
GOVERNOR

September 30, 1985

Mr. Stephen P. Mealey, Forest Supervisor
Shoshone National Forest
P.O. Box 2140
225 West Yellowstone Avenue
Cody, WY 82414

Dear Mr. Mealey:

The proposed Land and Resource Management Plan for the Shoshone National Forest and the related environmental impact statement have been circulated for state agency review. Copies of agency comments are enclosed for your consideration and use. These comments should be fully addressed and reflected, where appropriate, in the final version of the Shoshone Forest Plan.

In general, it appears that the preferred management alternative is a legitimate attempt to strike a considered and reasonable balance between commodity and non-commodity uses of the forest land resources on the Shoshone. However, refinements to the proposed plan may be necessary due to substantive general public, industry, interest group and state agency comments. Moreover, it is essential that future budget requests and allocations are balanced, supporting the full spectrum of commodity and non-commodity resource management and development activities. The adverse effects of the reduced budget alternative on many resources points to the importance of budgetary support for the on-the-ground management activities proposed in the plan.

It is obvious that your staff spent a considerable amount of time working with various entities and interests during development of the draft plan. You undoubtedly discovered that the public wants the Forest Service to be a balancer of interests, all of which they would like served. It is important that your staff continue to work with the various entities and interests during refinement, implementation and monitoring of the Forest Plan. Public support for implementation will be a function of public understanding and impression that their comments were fully considered and that their involvement was valued and useful. While the final management plan may not reflect every particular desire, if it can be shown to make "multiple resource sense" in as cost efficient manner as possible, it should meet the test of public acceptability.

Thank you for your comment.

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I note that one of the principles of the Shoshone Plan was to focus on the alternative that preserved the most options and opportunities. I share your belief that preserving options and opportunities is in the public's interest. As such, I strongly believe that any potential designation or management scheme for the Clark's Fork River must preserve the state's option to develop its Yellowstone River Compact allocated waters. The Wyoming Water Development Commission is actively investigating development opportunities on the Clark's Fork and the State is beginning negotiations with the State of Montana concerning development and management options under the Yellowstone River Compact. The results of these efforts must be factored into any decisions regarding designation or management of the Clark's Fork River in Wyoming.

Thank you for the opportunity to review and comment on the proposed Shoshone Forest Plan. Please keep me informed of the progress in this effort.

Yours sincerely,

Ed Hessler

EH:pcl

Enclosures

Forest Service Response

1a

97-1a Our direction in the Forest Plan preserves the option to include this outstanding river segment in the National Wild and Scenic River System. The direction also preserves the option of studying the River and its capabilities in terms of development. Actual development would foreclose on the former option, whereas Congress could act at anytime to declassify the river if an overwhelming need should arise.

The FEIS evaluating the wild and scenic proposal surfaced no overwhelming public need for development within the corridor. All comments we have received in this effort run to the contrary, citing economic, biologic, social and aesthetic criteria for leaving that portion of the River undeveloped. Many respondants also feel that development opportunities could be implemented while leaving the wild river segment eligible for inclusion in the National System. See also the response to comment 13-1.

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THE STATE OF WYOMING

ED HERSCHLER
GOVERNOR

Game and Fish Department

CHEYENNE, WYOMING 82002

W DONALD DEXTER
DIRECTOR

September 23, 1985

EIS 2736
USDA/FS-Shoshone NF-Land
and Resource Management
Plan/DEIS

Mr. Dick Hartman
State Planning Coordinator
Herschler Bldg.
Cheyenne, WY 82002

Attention: Mr. Paul Cleary

VI-268

Dear Mr. Hartman:

In response to your notification, SIN 85-201, we have reviewed this Land and Resource Management Plan along with the DEIS and offer the following comments and information to be used by the Forest Service in finalizing their resource plan and impact statement.

General Comments:

In general, we agree with the choice of Alternative D, which emphasizes non-commodity values such as wildlife and recreation while producing current levels of commodities such as timber and grazing. It is our understanding that many ranges are presently being overgrazed, and we question whether commodity output on the Shoshone National Forest can be increased as described if that is correct. Timber harvest increases, as it appears to us, will require taking most harvestable trees, seriously limiting security and thermal cover for wildlife. We fully agree with the benchmark analysis results summarized on page B-41 of the DEIS: "The Forest has a relatively low potential for producing commodities, with its major values being wildlife, scenic beauty, and recreation." There is an opportunity to maintain and improve habitat for wildlife, and to realize significant benefits from wildlife-related recreation on the Shoshone National Forest. This plan could provide the framework to do so. The concerns we express about the plan reflect our desire to assist the Forest Service in improving wildlife opportunity.

We have several areas of concern which need to be addressed, and in some cases these will require changes in the plan. All of these recommendations should fit Alternative D, the preferred alternative.

Range - General

The plan calls for an increase in livestock on the Forest by the end of the planning period (50 years). There is apparently no similar provision

1

Forest Service Response

97-1 Standards and Guidelines for maintaining security and thermal cover for wildlife will be adhered to.

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for an increase in wildlife numbers, even if range conditions improve and carrying capacity increases. We feel that wildlife should be afforded the same chance to increase, especially if there are no conflicts for forage or space. The plan does not deal with the contingency that economic conditions for agriculture may worsen, and that there may be less livestock on the Forest, resulting in more forage for wildlife. 2

The concept of preserving forage for wintering wildlife is basically a good one. In the plan, however, it appears that wildlife gets the first cut and livestock gets second best. While we certainly are in favor of wildlife getting priority consideration whenever possible, we are compelled to point out that in many cases this could be counter-productive, especially where the same livestock operator supports a lot of wildlife on his private lands. Where over-grazing is presently occurring, corrective measures should be taken without pitting wildlife against the livestock. In some areas, over-grazing has occurred for years, and reduction in wildlife may be used to help make changes. We feel each grazing situation should be evaluated case-by-case. Where competition is severe, adjustments may be necessary on each side. 3

Timber - General

Timber Management

No more than one-fifth (20%) of a timber stand in an analysis area can be harvested in any one decade if dispersion standards designed to maintain the timber stand as good elk habitat (i.e. maximum cut blocks 40 acres, and minimum buffers of 600 feet between cut blocks or between cut blocks and existing openings), are to be met, assuming a 20 year time period for regeneration of cover on cut blocks. This standard is one-seventh (14%) per decade assuming a 30 year time period for cover regeneration (Hoover and Wills 1984). However, the Forest also has to meet a non-declining flow harvest goal. With this goal, the percentage of suitable timber which can be harvested per decade is dictated by the timber rotation period. A rough estimate of rotation period based on acres of pole timber management (80 yrs.) and sawtimber management (120-140 yrs.) in the Lander and Wind River Ranger Districts is 110 years. To meet the non-declining timber harvest goal for the forest over the span of this 110 year period, no more than nine percent of the timber suitable for harvest can be harvested in any one decade. Obviously, if the timber harvest schedule is designed to remove no more than nine percent of harvestable timber per analysis area to ensure that the non-declining timber harvest goal is met, adequate cover can be maintained for elk and other successional stage dependent wildlife in each analysis area. Old growth dependent wildlife habitat needs should be adequately provided for in the timber harvest areas (Prescriptions 7C,E,F) because most timber stands to be harvested are intermixed with unharvestable old growth timber. Also, most of the Forest's timber will not be harvested because it is unsuitable timber, i.e. wilderness. 4

Forest Service Response

97-2 The forage would be allocated to both unless there is a change in Wyoming Game and Fish population objectives or Range Allotment Management Plans.

97-3 Prior to any reduction in stocking, range reanalysis will occur, the State Game and Fish will be asked to jointly ride the allotment with Forest Service and permittee, and numbers will be established based on discussion of parties involved.

97-4 We are glad to see our dispersion assumptions confirmed by the Wyoming Game and Fish Department. It can be considerably difficult to build dispersion into the timber scheduling model. We used a 20 year reentry with cutting of no more than one third of each individual stand per entry. This is slightly more restrictive than the one fifth per decade mentioned in page 2 of your response (2/5 per 20 years = 6/15 versus 1/3 per 20 years = 5/15). We recognized the need for a 30 year reentry option for specific management situations involving water, wildlife, or visuals. Unfortunately, limitations in FORPLAN prevented this option to be directly included in the scheduling model. During Environmental Analysis for each timber sale dispersion will be considered again along with other area-specific factors and harvesting planned accordingly. Unless widespread inadequacy of the 20 year reentry schedule is discovered, occassional use of a 30 year reentry option will not require a forest-wide reanalysis of the timber harvest schedule.

Since the dispersion standard is applied to each timber stand, the standard will be met on an analysis area basis as well. Plan Appendix A shows the acres of harvest by sale. From this appendix one can partially determine the actual cutting scheduled on each analysis area. Nowhere in the Plan or EIS documents are the acres of suitable timber in each analysis area listed. This is a shortcoming that we were unable to correct in time for publication of the Plan and FEIS. Suitable timber land is the actual acres managed for wood fiber production, whereas the acres in the 7E management area includes both the suitable timber land and interspersed nonforested and unsuitable timber land. The definition of the 7E management area did not change from DEIS to FEIS although the location of 7E areas has changed (refer to the Management Area Map of the Plan).

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Based on this background knowledge, analysis of the proposed acres of timber to be harvested under Alternative D on the Forest over the next five decades (Table D-5 Plan, Table IV-14, DEIS) compared to the available acres of suitable timber (Table D-1, Plan) indicates that the non-declining timber harvest goal will be met. Our estimates based on a 110 year average rotation period and 101,000 acres of suitable timber suggests an average of 9,182 acres can be harvested per decade. We ignored the intermediate cut acres and shelterwood removal cut acres each decade, since they are the same acres treated by either clearcut or shelterwood seed cuts. We added clearcut acres, shelterwood seed cut acres and an average per decade selection cut of 237 acres (based on input from the Forest Service that selection cuts will be practiced on an approximate total of 2,600 acres forest wide during the 110 year rotation cycle) and divided the total by the number of decades (11). This indicated that an average of 8,453 acres of land will be affected per decade during the first five decades. Although these estimates are approximate, similarity of these results indicates that the non-declining timber harvest goal can be maintained over a 110 year period with the proposed harvest schedule for the next five decades. As a consequence, with the exception of specific sales mentioned later in this review, there should be very little trouble maintaining adequate cover for elk on the acres of suitable timber land, since only nine to ten percent of the timber will be treated each decade. However, proper sale design and layout will still be very important and this Department would like the opportunity to provide input on all future timber sales.

4

Although the plan does not state that the re-entry schedule for individual timber stands is based on a 20 year cycle, Table D-5 indicates such an intention is based on the number of decades between repeating acreage figures. The plan assumes that elk and deer hiding cover will regenerate on cut-over areas within 20 years, allowing adjacent cuts at the end of the 20 year period. Past clearcuts on Burnt-Gulch, Sawmill Creek, Townsend Creek and Wiggins Fork are 19 to 20 years old. The regenerated timber on Townsend Creek could probably be classified as hiding cover but regeneration on most of the Burnt Gulch, Wiggins Fork and Sawmill Creek cuts are not even close to providing adequate hiding cover. All of these cuts were larger than 40 acres, which certainly reduced the chances for cover to regenerate in 20 years. If cover does not regenerate in 20 years on the 40 acre or smaller cuts but does in 40 years, there will not be much impact on an analysis area basis. However, this could result in 66 percent of an individual timber stand being without cover for 10 to 15 years. This could be a problem in larger analysis areas (over 12,000 acres) if all timber stands treated during a three decade period occur in one portion of the analysis area. On the other hand, if a thirty year period was used for re-entry scheduling, there would be much less chance of cut-over areas not providing cover when re-entry was due. Using a 30 year re-entry schedule would probably require treating more stands (affecting a larger percentage of the suited timber lands) each decade, which may require more roads per decade to meet the harvest schedule. We feel this was obviously a trade-off. Sixty-six percent

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(in scattered tracts 40 acres or less) of a timber stand without cover is not much different than 60 percent, supposedly the optimum. We feel the plan should evaluate use of a 30 year reentry period for clearcut and shelterwood seed cuts to see whether a timber harvest schedule could be produced that would not require more miles of road than under the 20 year reentry cycle. We recommend use of a 30 year reentry cycle if more miles of road are not required to accomplish the timber harvesting than with the 20 year re-entry cycle.

Although the proposed timber harvest schedule appears to meet wildlife needs forest-wide, problems could occur if most of the harvest for one decade was planned for only a few analysis areas on one portion of the Forest. We assume this will not occur since dispersion standards will be applied to individual timber stands as well as each analysis area. If the total acres listed for each analysis area under Column 7E in Table III-3 of the plan were the actual acres of timber to be treated, one could analyze the timber harvest for the first decade (Appendix A) in each analysis area to see if the percentage of suitable timber to be removed in each analysis area is in line with the plan's intent. However, acreages listed under Column 7E, Table III-3 of the plan for all analysis areas suggest that over 200,000 acres of the Forest will be timbered. This total is obviously a lot higher than 101,000 acres, the total that will receive timber harvest treatments according to Plan Table D-1. This discrepancy needs to be corrected. We recommend that Column 7E reflect the actual acres of suitable timber to be treated with all aged harvest management, so an effective analysis of proposed timber harvest for each analysis area can be completed. 4

Road Management

Open road densities have the greatest potential for negatively impacting elk habitat, according to nearly all the most recent research on the subject. Even though this problem is mentioned in the plan, proposed open road density standards do not address this problem adequately and are considered by this agency to be the weakest part of the proposed plan.

There should be an average density of no more than 1.2 miles of open road per section in any analysis area, or no more than 2 miles of open road in any square mile of forested cover if the roaded area is to be maintained as good elk habitat (Hoover and Wills 1984). Standards and guidelines for transportation system and trail system management in the plan (pg. III-128), need to be changed to these recommended standards. exceptions can be dealt with case-by-case, i.e. switchback systems to access steep slopes. Adoption of these standards will help to off-set potential future negative impacts of timbering and mineral activities. The standards presented in the plan (average open local road density of 2 miles/square mile in fourth order watersheds and average motorized trail density of 4 miles per square mile on 7

Forest Service Response

97-7 In response to numerous concerns, the number of acres managed for timber harvest and the resultant amount of roads has been reduced in the final Plan. In the next fifty years, the Plan projects only eighty miles of new road which will be open to the public. There is projected 120 miles of existing road which will be improved and remain open to the public. An additional 150 miles of new road, and 255 miles of reconstructed existing roads are projected to be closed to the public within the 50 year period. Road construction and reconstruction figures have been corrected. See also response to comments 182-5, 33-9, 80-5, and 44-46.

To access all timber in a continuously timbered area requires approximately 4 miles of road per square mile. The majority of these roads are local and are scheduled to be closed following timber harvest. Road management decisions and the decisions to build new roads are based on a consideration of all resources in an area, including wildlife needs and the targeted recreation opportunities being provided. The Forest Service is well aware of problems in road closure enforcement. See also response to comments 146-14. The standards for road densities contained in the forest standards and guidelines and in the individual management area prescriptions have remained unchanged.

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fourth order watersheds or 2 miles per square mile in non-forested areas) will adversely affect wildlife. Based on our recommended standards and a detailed review of existing miles of open roads and sections of roaded management area in each of the analysis areas (Appendix J), the following recommendations are provided: 7

A.A. 91,93,96; A.A. 98; and A.A. 99 - Average open road density near maximum - any new road construction should be kept to a minimum and resulting roads should have yearlong closures.

A.A. 94 - Average open road density approaching maximum - all but 5 more miles of new road should have yearlong closures.

A.A. 101 - Average open road density is 1.8, which is too high; 9 miles of currently open roads should be closed. The proposed 7 miles of new road construction in the first decade of the plan is excessive in light of the current road density. Any new roads should have yearlong closures.

A.A. 102 - Current average open road density is okay. The proposed 13 miles of new road construction in decades 2 and 3 of the plan will far exceed acceptable average open road density. This proposal needs to be reduced considerably and, except for 4 miles, all new roads should have yearlong closures. 9

A.A. 108 - Current average open road density is 1.6, so 12 miles of open roads need to be closed yearlong. The proposed 14 miles of new road construction during the 1st and 2nd decades of the plan is excessive in light of the current road density. Any new constructed roads should have yearlong closures.

A.A. 111 - 1 mile of open road needs to be closed.

A.A. 114 - Current average open road density is at maximum. The two new miles of road proposed for the second decade of the plan should have a yearlong closure.

Open road density cannot be evaluated in the Wind River Ranger District because all miles of road in these analysis areas are listed as controlled. Miles of road open to the public need to be listed for all of the Wind River Ranger District analysis areas, in order that open road densities can be evaluated. Based on the miles of existing controlled roads, this analysis area could exceed the proposed average open road density standard. Any new road construction should be minimized and the resulting roads should be

Forest Service Response

The Forest Plan will guide management over the next 10 to 15 years and will be revised every 15 years or sooner in response to major changes in information or needs of the American public. Projections over 50 years are provided to portray long term consequences only.

97-9 The Forest Service is very much aware that too many open roads in an area, and in fact even one open road in some areas, can be very detrimental to big game. Once the Forest Plan is finalized, we will still go through the environmental analysis process for each project proposed. At that time the Game and Fish will be consulted as appropriate as part of the environmental analysis. Their recommendations will be incorporated into each project.

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Forest Service Response

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closed yearlong. Where plans are to close a new road after management activities associated with the road are completed, the road should be installed in such a manner that road use can be blocked with an effective physical barrier. Sign closures are not always effective and therefore other acceptable and efficient closure methods should be used. 9

In the Environmental Impact Statement (pg. III-64) (Demand Trends) access for general public use is discussed as a major issue. The only listed approach for dealing with this issue is to obtain access from willing sellers. We agree with the stated objective of obtaining at least two rights-of-way per year.

Specific Comments:

Draft EIS:

Pg. III-46 - The suitable timberland base was increased from 93,000 acres to 144,682 acres, partially by including lands with 40-60% slope. These are lands not previously considered suitable, and we contend they should not be considered suitable now. Since 101,000 acres of timber were used for the timber harvest scheduling in the plan, there are apparently some 40-60% slope lands included. Do current timber harvesting techniques permit harvesting timber on slopes of this magnitude while protecting other surface resources? If not, we feel these acres should not be included in the land base for scheduling timber harvest in the plan. 10

97-10 The Forest Service cannot make the economics decisions for individual private logging companies as to whether it is economical to bring in equipment needed to log steep slopes. Therefore these lands have been considered tentatively suitable. However, with the current methods of appraisal, stump age values on these lands are less than on 0-40% slopes. In the Final Forest Plan no steep slopes are in the suitable category due to economics.

Pg. IV-28 - A.U.M. equivalents used for wildlife appear low. We recommend the following equivalents: Elk 2.1, Deer 7.8, Sheep 6.9, (Hepworth 1979). 11

97-11 Various authors have different conversion rates. SCS rates rounded off to nearest whole unit were used. For example, elk equals 2.0 rather than 2.1.

Pg. B-33 - Benefit values used in analysis of hunting and fishing days were considerably lower than values estimated by this Department and much lower than those developed by the State of Idaho. We are unaware of the source of values used in the plan and we recommend more realistic values be used. 12

97-12 See reponse to comment 44-7.

Forest Service Plan

Management Situation

Pg. II-19 - In Table II-5, the value for the 1991-2000 time period for forest plan objectives (capacity), for developed recreation is 169 and we wonder if that is an error. 13

97-13 The number in the table has been corrected.

Pg. II-28 - In Table II-7, the RN values for planning periods 1 and 4 in the Wind River Ranger District appear to be type or decimal point errors. 14

97-14 The values have been corrected.

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Pg. II-29 - This states that the current number and capacity of developed recreation sites on Forest are adequate to meet predicted demand. If this is so, we wonder why several multiple unit campgrounds and/or picnic areas are planned in future decades, i.e. Snow Creek Campground in analysis area 93. 15

Pg. II-90 - Discussion for planning problem 6 does not point out the importance of managing for proper levels of cover and open road density to ensure that elk and other wildlife are not displaced from good habitat which is suitable for timbering. Also, there is a statement here that in areas of crucial preferred winter range, available forage is reserved strictly for wildlife. This does not agree with the descriptions of prescriptions 5A (pg. III-164) and 5B (pg. III-169), which presumably apply to areas of crucial preferred winter range. We do not agree with the concept of crucial preferred winter range. Crucial range is all crucial by definition. One portion is not more important than another. We feel such a concept may allow development in part of the crucial winter range on the grounds that only the "preferred" portion is important. If our assumption is true, we cannot agree with that concept. 16

Management Direction

Pg. III-6: We are pleased to see the goal of providing increased public access to National Forest System lands.

Pg. III-12 - In Table III-1, no increases in MWUD are projected for consumptive or nonconsumptive use of wildlife. Consumptive use may stay relatively constant, but nonconsumptive use will increase over the next five decades, if the trend nationwide continues. 18

Pg. III-46-48: We recommend the following general direction statement be added under Wildlife and Fish Resource Management: Plan water development, mineral exploration and development, timber harvest, livestock grazing and other project uses and management practices to ensure activities are compatible with fishery management objectives, to ensure adequate protection is given to the fishery resource to prevent fish habitat degradation, and to ensure unavoidable adverse impacts are mitigated. 19

We further recommend the following Standards and Guidelines for the above General Direction statement: Require minimum (conservation) pools of at least 1/3 of the water surface area for all new impoundments capable of sustaining fishery resources. 20

Pg. III-48,49 - The standards for cover maintenance in Item 1.c. would essentially render the described non-forested ecosystems unuseable by 21

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Forest Service Response

97-15 While total capacity is adequate, several new sites are proposed to distribute use more effectively during the peak season and to protect currently undeveloped sites that are receiving considerable activity.

We do not believe that the Wyoming State Comprehensive Outdoor Recreation Plan (SCORP) and the Forest Plan should be compared for purposes of determining correct demand and capacity because the scope of the SCORP is so much more inclusive. We do not think they are in conflict. We have included the SCORP into our document by reference. The Forest Service was aware of SCORP data when it made its demand estimates for developed recreation. Demand conditions will be re-evaluated during the next ten years.

Data relating to Buffalo Bill State Park and Boysen State Park have been modified. The typing error in Proposed Plan, table II-5 has been corrected. Appendix J of the Proposed Plan contained descriptions of the nature of developed recreation site construction. This information is summarized below.

ANALYSIS AREA	TYPE OF DEVELOPMENT	WHEN
002-Basin	Develop Overlook at Sunlight Bridge	1st Decade
007-Lake Creek	Construct Campground at Lilly Lake	2nd Decade
007-Lake Creek	Snowmobile Parking and Restroom-Beartooth Hwy.	1st Decade
026-Beartooth Highway	Implement Beartooth Highway Visitor Info. Plan	1st Decade
042-Gooseberry	Construct 30 Unit Campground - Brown Creek Flat Area	1st Decade
091-Bayer Mtn.	Construct 20 Unit Campground and 10 Unit picnic ground - Snow Creek Basin	2nd Decade
100-Shoshone Lake	Construct 40 Unit Campground at Shoshone Lake	3rd Decade
114-Louis	Construct 10 Additional Units - Popo Agie Campground	2nd Decade
182-Fish Lake	Construct 1 Campground - Warm Springs Creek	1st Decade
189-Whiskey Mtn.	Construct Trailhead at Torrey Creek	1st Decade
191-Wind River	Potential for 24 Unit Campground at Brooks Lake	1st Decade

97-16 See Appendix J for allocations of forage both on and off CPWR. Prescriptions 5A and 5B are emphasis prescriptions and not forage allocation specifics. See definitions of CPWR and crucial winter range, Glossary, DEIS, page 7-6. See response to comment 83-9, 182-37, and 97-28.

97-18 See response to comment 44-8.

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21 elk. The percentage of forested area in cover should be 80%, 85%, and 90% respectively, for diversity units with 35 - 40%, 20 - 34%, and less than 20% forest cover.

22 Pg. III-68: We recommend the following Standards and Guidelines be included for Water Resources Improvements and Maintenance General Direction statement number 1:

"Provide for sufficient maintainance flows to protect from change the scenic esthetic values and fish and wildlife habitats and the environment. In all streams that support a fishery or receive seasonal spawning use, adequate habitat maintenance flows will be provided. Until a detailed incremental flow method develops refined flow needs, a standard reconnaissance level flow of not less than 30 percent of the average daily flow (ADF) for the year and a flushing flow of not less than the estimated bankful discharge for a continuous 72 hour period that coincides with the spring runoff season will be used. Determine instream flow needs using an accepted method, prior to the implementation of any project that will directly or indirectly alter the stream flow in any fishery support system."

23 Pg. III-93: Transportation Systems Management. We are particularly interested in road systems, as they can contribute substantial quantities of sediments to streams. We believe soil types should play a major role during route planning and as part of the decision process for determining which roads are to be closed. Erosive soils or those prone to slumping or bogging, should be avoided.

24 We recommend fisherman access be considered along with other criteria when desired road densities are developed. In areas where access currently exists, a minimum of one road access point per five miles of stream should be maintained. If potential conflicts arise with the road density criteria, we would be happy to assist with a resolution to that conflict. Superfluous roads in areas which already have adequate access should be considered for closure.

25 Pg. III-121 - Standards for areas to avoid location of future transportation corridors (highway, railways) should include crucial big game winter range and migration routes. (Prescription 5A & 5B areas).

26 Pg. III-117, III-127, III-135, III-142, III-155, III-175, III-183, III-192, III-200, III-228 - The standards used (minimum stocking rates of 190 trees/acre for mixed conifers and 150 trees/acre for lodgepole pine and Englemann spruce-subalpine fir that are 6 feet in height) to define when a cut-over area is no longer considered an opening does not approach the stocking rate necessary to provide cover. Use of this standard will essentially allow timber harvesting adjacent to a previously cut-over area that is not effective cover. This will produce

Forest Service Response

97-20 Proponents for development of larger impoundments that are capable of supporting fisheries are expected to come from the private sector or the State of Wyoming. The regulatory authority regarding quantities of water to be stored, diverted, or remaining in a stream is the State of Wyoming (State Engineer). Minimum pools would seem to be a negotiated item between the proponent and the State or other Federal Regulatory authority, upon consideration of recommendations from your office and ours on a specific project.

97-21 Many of the diversity units dominated by nonforested ecosystems have little if any of the forested areas that meet "cover" requirements and yet are still being used by elk. However, the standards and guidelines are minimum and projects in these areas will be coordinated with local Wyoming Game and Fish presonnel. In a 5000 acre diversity unit, the minimum acreages in hiding cover (if available) would represent 25 percent, 18 percent and 15 percent, respectively, using 50 percent, 30 percent and 20 percent forested. Using the suggested standard (it is not clear if these are intended as minimums) the acreages in hiding cover would be 40 percent, 25 percent and 18 percent, using the same example. The differences do not appear to be significant, but will be considered for projects in these areas. Very few of these areas have commercial timber on them in the Shoshone National Forest.

97-22 Any such development proposed by the Forest Service are subject to constraints on water use provided by the Office of the State Engineer. Planning would involve coordination and cooperation with your office. The majority of such development proposals are expected to come from the private sector. Because of court precedents and because of the Bighorn adjudication, settlement between the Forest Service and the State of Wyoming, our authority to recommend instream flows is related only to stream channel maintenance. Water flows for scenic purposes, fish habitat, esthetics or wildlife are not legally recognizable water uses at present. Water for these purposes would again seem to be negotiable items between the proponent, the State Engineer or other Federal regulatory authority, with recommendations from your office and the U.S. Fish and Wildlife Service.

97-23 This direction is present under Soil Resource Management in the Plan, blue pages. The Forest employs a soil scientist to collect appropriate soil data and to act as an interdisciplinary team member for planning activities that could affect soil properties.

97-24 Access for all types of recreation, including fishing, hunting, camping, is a consideration when road densities are calculated. Such access needs must be balanced against the effects that roads have a wildlife habitat, water quality, and aesthetics.

97-25 Projects such as this are subject to further analysis under NEPA and would not be permitted if found incompatible with wildlife.

97-26 These standards describe when areas are no longer considered openings from a visual standpoint, not from a wildlife standpoint. The figure indicates sixty percent of the area is hiding cover; thermal cover is defined the the EIS Glossary.

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creating openings much larger than 40 acres. The recommended minimum stocking rate that will provide cover is 450 trees per acre, 8 feet in height. Four hundred trees per acre 6 feet in height would provide marginal cover. The statement under general direction which says that a cut-over area is considered an opening until deer and elk hiding cover reaches 60 percent of potential is unclear. Does this mean 60 percent of the area is hiding cover or the entire area is only 60 percent effective as cover? If the latter is the intent, the cut-over area is not cover and adjacent cuts should not occur until cover is reestablished. Although hiding cover is defined adequately in the document, management for cover will not be adequate if the general direction and standard presented in the plan are adopted. Thermal cover is not defined in the plan and we recommend it be included. We recommend that thermal cover be defined as tree stands at least 30 to 60 acres in size in sapling-pole stage or older with canopy closures of 70% or more. 26

Pg. III-153 - The standard to maintain at least 90 percent of the habitat needed to support the state population goals of species commonly hunted, fished or trapped (item 2.1) is inadequate. Our population objectives are presented to the Forest Service for concurrence. Once agreement has been reached, both agencies should try to provide 100 percent of the habitat needed on Forest Service lands to support those objectives. The standards and guidelines for item 3.1, wildlife and fish resource management, need to be expanded because forest direction standards on pg. III-48, item 1.a, do not appear adequate to provide sufficient cover along the perimeter of natural and created openings or along streams and rivers. Forest Service direction sets 60 percent as the minimum cover to be maintained on the perimeter of natural and created openings. The standard in the Shoshone Forest Plan allows silvicultural practices that create openings to occur adjacent to each other, resulting in larger than 40 acre cut-over areas. We suggest standards be changed to prevent this from occurring. Forest Service direction also sets 60 percent (40% hiding cover, 20% thermal cover) as the minimum cover to be maintained along streams and rivers. The minimum cover standard should be much higher than 60 percent, since riparian areas are key wildlife use areas and should be maintained for use by wildlife. 27

Pg. III-156 - Transportation system management activities list no standards for minimum road densities. The standards recommended previously in these comments should be incorporated here. 28

Pg. III-166; III-173 - We are not sure what items 1.c &d, pg. 166 and items f & g, pg. 173, mean as standards for wildlife and fish resource management. As pointed out earlier, if the state's population objectives have been adopted, the Forest Service should be managing for 100% of the 29

97-27 See response to comment 59-46. The intent of the Forest Plan is to try and meet the objectives established by the Wyoming Game and Fish Department. Where concurrence is not always agreed upon (as noted in the North Fork Shoshone Elk Unit) habitat management will be accomplished to the maximum extent practical with other resource considerations. See response to comment 97-26. We agree that riparian areas are key areas for wildlife but consider sixty percent cover sufficient to maintain wildlife use. It should be noted that most standards are minimums and not what the Forest objectives are on average.

97-28 To access all timber in a continuously timbered area requires approximately 4 miles of road per square mile. The majority of these roads are local and are scheduled to be closed following timber harvest. Road management decisions and the decisions to build new roads are based on a consideration of all resources in an area, including wildlife needs and the targeted recreation opportunities being provided. The Forest Service is well aware of problems in road closure enforcement. See also response to comments 146-14. The standards for road densities contained in the forest standards and guidelines and in the individual management area prescriptions have remained unchanged.

97-29 See response to comment 97-27. We generally consider leave strips that are as wide or wider than cutting width to be adequate. On the Shoshone where forage is generally the limiting factor for wintering wildlife, a smaller percentage of cover is needed, especially in light of road restrictions on these wintering areas.

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cover and forage necessary to support that portion of the population on the forest, especially on winter range. The standard item 1.a, pg. 173, for wildlife habitat improvement and maintenance suggests a minimum leave strip at least 300 feet wide. The leave strip standard should be 600 feet between patch cuts. | 29

Pg. III-178 - We suggest there be a standard added for transportation system management that provides for a 1/2 mile no snowmachine use buffer adjacent to all crucial big game winter range. | 30

97-30 Areas that are closed to snowmobiling use due to wildlife considerations relate to many factors and do not always correspond to a one-half mile buffer strip.

97-31 The recommended wording is adopted.

Pg. III-235: Management Prescription 9A (Emphasis is on Riparian Area Management) - Transportation System Management, No. 1., b. We recommend the addition of the following sentence: Bridges and bottomless arch structures are preferred over the use of culverts. | 31

97-32 Should these variables prove to be excessive, the Plan can be amended to be more restrictive.

VI-277

Monitoring

Pg. IV-1 - Monitoring has to be an important part of this plan if the plan is going to work. The monitoring program will be prepared as part of the Forest Service's annual work program. However, the amount and location of monitoring will be determined by the approved work program and funds available for monitoring. Funding for monitoring will need to be a high priority because long-term timber production and forage allocation for domestic livestock will depend on how timber regeneration and forage production respond to the first two decades of work. If timber cover is not regenerating as predicted, timber harvest will have to be adjusted to prevent loss of future management options. This cannot be determined without adequate monitoring. | 32a

97-32a Monitoring and evaluation of the implementation of Forest Plans are required by 36 CFR 219.12(k). Funding for these activities are currently being built into agency budget requests. Funding for an adequate monitoring program will become a part of the Forest Service's regular budget. Should adequate funding for monitoring not be appropriated by Congress, plans will be made to provide for monitoring within available resources since this action is required by law.

Pg. IV-5 - Allowable variability levels for wildlife habitat diversity of 20% and 25% for riparian condition rating appear excessive. | 32

Pg. IV-5, 6, 7 - Under what item does cover regeneration monitoring take place? If this type of monitoring is not included, we suggest it should be. | 33

97-33 This item falls under "Wildlife Habitat Diversity" monitoring found in Plan, Chapter III and IV.

Pg. IV-2 - The plan addresses monitoring through use of a set of implementation maps covering 10 years of projects. It would be beneficial if a copy of this map for each Ranger District were included in the plan so the reviewer knows exactly what the proposed timber harvest and road building activities would look like when completed. | 34

97-34 Implementation maps will be finalized upon approval of the Plan and kept on file at the Supervisors Office and Ranger District Offices. It was not possible to include them in the Plan.

Appendix A

Pg. A-4 - Under the Sawmill sale, the Frye Lake analysis area is #94, not 92, and the Township cannot be 42N, it is probably 31N. | 35a

97-35a Plan, Appendix J has been revised and corrected.

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Pg. A-9 - The analysis area number or name is wrong for the Bog Lake sale. The Range is wrong for the Spring Mountain sale.

Pg. A-10 - The Bayer Mountain A.A. is number 91, not 591.

Pg. A-11 - The OR harvest method needs to be defined. **35a**

Throughout the plan, timber targets are based on volume (M.M.B.F.), not acres. Yet, acres are the base for determining how much land can be treated each year to maintain a sustained yield, given 101,000 acres of suitable land and an average rotation period of 110 years, as well as meeting cover/forage ratio constraints. Acres of suitable timber are much more accurate and understandable estimates than available timber volume. If volume estimates for a sale are very inaccurate, the whole plan starts to fall apart because the timber company will have to cut more acres to get enough volume. We recommend that timber targets be based primarily on acreage figures and secondarily on estimated volumes with no guarantee on volumes. **35**

97-35 We agree that timber targets are more appropriately expressed as acres rather than volume. Acres are much more meaningful for management planning for the nontimber resources such as water, wildlife, and recreation. Acreage considerations are also important in planning the achievement of a regulated forest. Traditionally the Forest Service has used volume and it will take time for change to occur. We recognize that acres treated is more important as a target and as a measure of program success than volume. Treated acres targets will be the primary mary timber-related driving force behind the Shoshone National Forest timber program (other resources also influence the timber program). If short falls in volume are experienced, appropriate action will be taken such as no action, Plan amendment, or Plan revis

Appendix F

Manning Class and Activity Fuel need to be defined in both Tables 1 and 2. There should be some provision for using prescribed fire on natural timber fuels in non-wilderness areas in the Lander Ranger District, as done in the Wind River Ranger District. Prescribed fire is a legitimate tool for removing fuels, setting back succession and improving wildlife habitat in timber stands, especially in timber stands that cannot be harvested or are dying from pine beetle infestation. **36**

97-36 Definitions of Manning Class and Activity Fuel have been added to the introduction to Appendix F. See also response to comment 2-1.

Appendix J

002 Basin Page J-13 Timber

Timber sales in Russell Creek, Little Sunlight, Washout, Trail Creek, Beam Gulch, and Gravel Bar will remove too much of the escape cover necessary to maintain elk harvest. The timber harvest will have an adverse effect on wintering elk by removing resting and escape cover adjacent to crucial winter range. The Trail Creek and Russell Creek sales will occur in an area where there are already other sales planned on Lodge Pole, Reef Creek, Oliver Gulch, Cathedral Cliff and Camp Creek. This will result in excessive cover removal. **37**

97-37 Little Sunlight, Trail Creek, and Washout have been removed from the 10 year program. Cover requirements will be met in the preparation and layout of scheduled sales.

003 Bench Page J-17 Wildlife

The number of wintering elk used to figure capacity on the Bench allotment should be reduced from 300 to 200. Using range improvements and other techniques, the capacity of the winter range can be improved. When the **38**

97-38 We agree with this, however, should analysis show a reduction of domestic livestock is necessary, when the range condition improves it will be allocated to both wildlife and domestic livestock.

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range has improved, our long range goal is 300 wintering elk. These wintering elk use both the private land and adjacent U.S. Forest Service land classed as "crucial preferred" winter range. On the "crucial preferred" winter range, livestock cannot be completely excluded. A more workable solution would be range improvements to get better distribution of livestock and reserve forage for 200 elk on the winter range. **38**

004 Crandall Pages J-20-21 Timber

Timber sales on Lodge Pole, Reef Creek, Russell Peak, Cathedral Cliff and Basin between 1985 and 1992 will remove 4,605 million board feet of lumber. This cutting, along with the old cuts on Camp Creek and Reef Creek will drastically reduce elk escape cover. The added access provided by timber roads will further diminish the area in which elk can escape and rest. **39**

97-39 Cover requirements will be met when preparing and laying out sales in this unit.

006 Ghost Creek Page J-26 Wildlife

Crucial preferred winter range for elk should be reserved in the Rocky Ford, Crandall solid waste transfer site area. There are approximately 100 elk wintering in the area, but there is no mention of this important winter range area in the plan. **40**

97-40 See response to comment 70-5.

006 Ghost Creek Page J-26 Timber

We believe the timber sale in Oliver Gulch, when combined with the other timber sales proposed in the area in the ten year plan (see Basin, Crandall), will contribute to excessive cover removal. **41**

97-41 See response to comment 97-39.

009 Table Mountain Page J-36 Timber

This area contains a population of resident elk in a good mixture of food, water, and cover with limited access. The proposed seven miles of road will provide easy vehicle access to the area. We suggest the area be managed as a roadless area. **42**

97-42 Further economic analysis has shown that timber activity from the Table Mountain area during the first decade would not be viable; therefore, all timber harvest has been removed from the first decade schedule. The Plan has been revised to reflect this change.

020 North Absaroka Page J-52 Timber

The upper Lodgepole sale scheduled for 1990 will remove valuable escape cover. This sale is to be clearcut and requires six miles of road construction. The cumulative effect of this sale on elk, in combination with the Lower Lodgepole, Olive Gulch, and Trail Creek sales will be severe. This area is valuable escape cover and a resting area adjacent to Sunlight Basin elk winter range. Elk hunted in Sunlight Basin and South Crandall use this area as escape cover. Presently, there is no vehicle access to the area. Vehicle access on Trail Creek and to the head of Lodgepole Creek would destroy this area's effectiveness as escape and resting cover. **43**

97-43 All roads will be closed to the public in this area. Cover requirements will be met in sale preparation.

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074 Washakie Needles Page J-124

Proposed management prescriptions for the Washakie Needles analysis unit as described in the Land and Resource Management Plan of the Shoshone Forest are generally acceptable. However, riparian zones are in poor to extremely poor condition and there are no plans presented to support the agreed upon population objective for moose. Management of remaining aspen would enhance deer, elk and moose habitat.

Mineral exploration activities on all portions of this unit should be restricted from December 1 through June 30 for wildlife protection.

44

97-44 Management of riparian areas is guided by direction in Chapter III of the Forest Plan. We do need more information and perhaps there are other opportunities. Management activities may be limited because of wilderness designation.

049 Sugar Loaf Page J-92

Mineral exploration activities on all portions of this unit should be restricted from December 1 through June 30 for wildlife protection. That portion of the North Fork drainage adjacent to the Forest provides critical winter range for 200 to 400 elk.

Mineral exploration activities during the winter could block migration corridors, make winter range unavailable, and create undesirable elk distribution. The riparian zones are only in fair condition. This section should include plans to improve riparian habitat to support population objectives for moose. Management of remaining aspen could improve deer, elk, and moose habitat.

45

97-45 The draft plan called for restrictions on mineral exploration from 5-1 to 6-30. The Final Plan has been revised to reflect 12-1 through 6-30 as the restricted season. Plans for riparian improvement may be forthcoming as more information becomes available; otherwise these areas are managed according to Chapter III guidelines.

055 Cottonwood Page J-102

Mineral exploration activities should be restricted from December 1 to June 30 in the entire area for wildlife protection. The portion of the Cottonwood Creek drainage adjacent to the forest provides critical winter range for 200-400 elk.

Exploration activities could block migration corridors, make winter range unavailable and create undesirable elk distribution. This could result in our having to reduce agreed upon population objectives.

Human disturbance from logging, firewood cutting and oil and gas activities appears to have displaced elk from the Grass Creek drainage. As a result, the Cottonwood Creek drainage now comprises the main proportion of the winter range for this elk population. Parts of the Cottonwood Creek and Gooseberry Creek summer ranges are over-utilized. There is no provision in this section for security areas for elk.

Due to the extremely crucial nature of the elk winter range in the Cottonwood Creek drainage, the Forest Plan should specify that there will be

46

97-46 The draft Plan called for restrictions on mineral exploration from 1-1 to 6-30. This has been revised to reflect 12-1 through 6-30 as the restricted season. The Cottonwood Analysis Area is currently being reevaluated as far as cattle numbers and length of season. Forage will be available for agreed-upon wildlife populations. The Wyoming Game and Fish Department will be consulted prior to any management activities, such as timber harvest, that might effect elk security. Consultation is also needed on the suggested activity restrictions (logging, firewood cutting, right-of-way acquisition).

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no logging or firewood cutting from December 1 through June 30. It should also specify that all roads, including the proposed right-of-way acquisition, be closed during this period. 46

040, 041, 050 Deer-Dick-Timber Creeks Page J-70

Timber Management

1. We feel too much timber will be cut in Timber Creek, resulting in excessive loss of elk cover.

2. Dick Creek (North Fork)

   a. Cutting of timber stands in middle North Fork should be delayed until new stands are well established - at least 5 years.

3. Dick Creek South of Riparian area - logging planned here will remove important security cover for moose.

Transportation

1. Road closures 47

   a. All roads east of Timber Creek should be closed to snow machines during December and to all vehicles from January through April.

   b. Snow machine use can be allowed in Timber Creek, Dick Creek and the Gwinn Fork of Dick Creek.

   c. The reason for these controls on vehicle use is to provide security for elk on the winter range. If the elk are displaced from these ranges, they move onto private lands where they feed with livestock or cause damage to stored or unstored livestock forage.

042, 044 Gooseberry - Guard Station Page J-74

1. Timber

   a. We feel that the proposed cuts are excessive and will result in excessive reduction of wildlife cover.

2. Transportation

   a. There are no wildlife-related reasons to restrict vehicle use during winter.

97-47 Timber harvest activities in the Deer-Dick-Timber Analysis Area will be conducted according to guidelines in Chapter III. Hiding cover is a prime consideration and harvest methods will provide for this habitat requirement. Additionally, site-specific environmental analysis will be conducted for each project and the Wyoming Game and Fish Department will have an opportunity to help with sale designs and timber harvest prescriptions. Road and area closures will be instigated as outlined in Plan, Appendix J. In the Gooseberry-Guard Station Analysis Area vehicle use of roads will not be restricted for wildlife reasons but travel may be restricted during some years to protect road investments and watershed values.

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043 Greybull Page J-78

1. Transportation

a. Snowmachine use should be restricted in the Phelps Mountain area, to the Phelps Mountain Road, because of wintering elk. 49

97-49 Snowmobile use of the Phelps Mountain area is not currently restricted. The area was not identified as an important wintering area, but if new information substantiates this, a travel restriction could be issued.

046 Pickett Creek Page J-85

1. Transportation

a. We recommend a vehicular closure from January 1 to June 20 on all roads to protect wintering elk and calving elk. 50

97-50 There will be a vehicular closure for the Pickett Creek Drainage from 1-1 through 6-20.

051 Woodriver Page J-94

1. Range

a. Sagebrush treatment on 200 acres is planned, yet extensive sagebrush control has already taken most of the brush. This area is important cover for elk calving, so remaining sagebrush should not be treated.

2. Timber

a. We agree with the timber harvest in the riparian area; however, we recommend no logging in the Brown Mountain sale area. Should logging occur, we recommend that all fir and spruce trees be left uncut, and the lodgepole timber be selectively harvested to maintain the high quality security cover for moose that currently exists here. 51

97-51 Sagebrush treatment in the Wood River Analysis Area is planned to increase forage for wildlife and domestic livestock. Such action will be preceeded by site-specific environmental analysis and all aspects, including elk calving, will be evaluated. The timber portion of the plan has been revised. All harvest activity will be governed by site-specific environmental analysis and moose habitat will be considered.

058, 068 Eleanor - Warhouse Page J-109

1. Range

a. This unit is very important to bighorn sheep and elk in winter. It is also very important spring transitional range for elk moving to the summer range. There are about 280 head of bighorn sheep and about 100 head of elk here in winter. Livestock grazing should be evaluated and managed on some sections to reserve forage for wildlife. 52

97-52 Domestic livestock grazing has been eliminated from the Eleanor-Warhouse area.

Frank's Peak Page J-112

1. Transportation

a. Snowmachine use in the Frank's Peak area should be restricted to 53

97-53 Snowmobile use of the Franc's Peak area is not currently restricted. The area was not identified as an important wintering area, but if new

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Meeteetse Creek Page J-115

1. Transportation

a. There are no wildlife-related reasons for restricting vehicular travel. **54**

97-54 A small portion of the Meeteetse Creek Analysis Area is closed to snowmobile use because of CPWR, otherwise, there are no restrictions on vehicular travel.

093 Ed Young Basin Page J-134

Snowmobiling should be restricted in that portion of A.A. 093 (Ed Young Basin) north of Ed Young Mountain to avoid stressing wintering moose and elk. This will change the output for Forplan Codes SNOW and NSNW. Seasonal restrictions for minerals activity should be December 1 - June 15, not January 1 - June 30, to protect winter range. **55**

97-55 Dates for seasonal restriction on seismic activity have been standardized based on Game and Fish recommendations (12/1 to 6/30 forest-wide). See also response to comment 97-57.

092 Dickinson Park Page J-137

Seasonal restrictions for minerals activities should be December 1 - June 15, not January 1 - June 30, to protect winter range. **56**

97-56 See response to comment 97-55.

094 Frye Lake Page J-140

In A.A. 94 the critical winter moose range along Sawmill Creek (see A.A. 99 comments) needs to be recognized and managed under the 5A prescription. Snowmobiling activities should not be allowed within 1/2 mile of this moose winter range. These changes will change the output for Forplan Codes SNOW and NSNW. The summary of practices, outputs, and effects indicate 21,280 acres of wilderness occur in the Frye Lake A.A. but review of the analysis area plan detail map indicates no more than 1,200 acres occur. There is a mistake here that needs to be corrected. **57**

97-57 Based on studies and literature review, there does not appear to be conflicts between moose and snowmobiles. Therefore restrictions on snowmobiling in moose winter range was not deemed necessary. We recognize possible future conflicts between snowmachine use and elk winter range. Should any conflicts develop, we will reevaluate the situation. See also response to comment 97-79. The wilderness acreage in the Frye Lake analysis area has been corrected.

098 Middle Fork Page J-147

This area contains critical elk winter range in the E½ of Section 1 and NE ¼ of Section 12, T32N, R101W, which is not indicated in the wildlife discussion. This winter range needs to be recognized in this discussion and the area should be managed under the 5A and 5B prescriptions. Seasonal restrictions for mineral activities should be December 1 - June 15, not January 1 - June 30, to protect winter range. Snowmobiling activities should not be allowed on critical winter range. This will change the outputs for Forplan Codes SNOW and NSNW. **58**

97-58 See response to comments 97-55, 97-57, and 97-79.

099 Sawmill Page J-150

This area contains crucial elk winter range in the NE¼ T31N, R100W and crucial moose winter range along Sawmill Creek below its confluence with Townsend Creek. Neither winter range is pointed out in the wildlife

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discussion, but both should be. These areas should be managed under the 5A prescription. Because general elk and moose winter range occur throughout this analysis area, snowmobiling should not be allowed, which will change the output for Forplan Code SNOW to 0.

101 South Pass Page J-155

In analysis areas 101 and 108, all forage is allocated to livestock according to range discussions. These areas receive considerable elk, deer, and moose summer/fall use. We suggest at least 10% of the forage should be allocated to wildlife. 58

102 Squaw Creek Page J-158

In A.A. 102 (Squaw Creek) snowmobiling activities should not be allowed in the NW¼, Section 1, Section 2, and Section 3, T32N, R101W because this area is adjacent to crucial elk winter range on BLM land and this area is used by elk during mild winters. This change will change the output for Forplan Code SNOW and NSNW. Mineral activities should be seasonally restricted from December 1 - June 15 in this same area.

There is no discussion of anticipated minerals activities for any of the Wind River Ranger District analysis areas. In addition, there is no mention of seasonal stipulations for motorized vehicles to protect crucial winter ranges for elk, moose, and/or sheep in A.A. 181, 183, 187, and 192. In A.A. 190 and 191, seasonal stipulations proposed for elk are January 1 - June 30 and no stipulations are proposed to protect moose and/or sheep crucial winter ranges and parturition areas. There should be seasonal stipulations of December 1 - April 30 to protect crucial winter ranges and May 1 - June 15 to protect all the birthing areas identified in these areas. In addition, snowmobiling should be restricted on all crucial winter ranges. 62

132 Big Creek Page J-194

Mineral operations should be restricted from January 1 - June 15, not January 1 - March 31 to protect wildlife during winter, and also during calving. 63

134 Bobcat Page J-196

There should be forage allocation for wildlife outside "critical preferred" winter ranges. Mineral operations should be restricted from January 1 - June 15. What vegetative manipulation is planned for this unit? It is shown on map, but not mentioned in the text. 64

135 Community Page J-199

There needs to be crucial winter range for bighorn sheep indicated on Aldrich Creek. 65

97-62 Minerals discussion has been added to the Wind River analysis areas in Appendix J. See AA-192, Recreation, in Plan, Appendix J. Analysis area 181, 183 and 187 have been open to snowmobiling in the past with no apparent conflicts with wildlife.

In analysis area 190 and 191, the crucial ranges for bighorn sheep are inaccessible by vehicles including over-snow vehicles. It has not been demonstrated that moose winter ranges need vehicular exclusion in most areas. For consistency, the dates for restrictions on the Shoshone will be January 1 to April 30 to provide protection for wintering wildlife and May 1 to June 20 for birthing areas. Exceptions to these dates will be made on a case-by-case basis as deemed necessary and appropriate.

97-63 We have considered your recommendation and have revised the restriction dates for mineral operations in the Big Creek and Bobcat (Ishawooa Hills) Analysis Areas. Mineral operations and motorized access are restricted from January 1 to June 20 in bighorn sheep and elk winter range and birthing areas.

97-64 See response to comment 83-22 and 97-63.

97-65 Identification and mapping of crucial winter game ranges, birthing areas, and herd unit objectives were done in full cooperation with the

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137 Deer Creek Page J-201

All forage is reserved for wildlife here, but up to 100 domestic sheep use the area during the winter. Determination of any conflict should be addressed.

The crucial winter range is occupied on a limited basis yearlong. In some years, the sheep move to these ranges by mid-September. For this reason, there should be controls on mineral development and other harmful activities from January 1 - June 30 as well as the fall. This special area should be withdrawn from mineral activities. **66**

140 Green Creek Page J-203

The new roads built to access logging areas should be closed during winter and spring to protect wintering wildlife. Snowmobiles should not be allowed on crucial winter ranges. Logging should occur during the summer to avoid conflicts with wintering wildlife. **67**

143 Hard Pan - Table Mountain Page J-205

There is no critical winter range for bighorn sheep shown for this area, but there should be in West Twin Creek. **68**

148 Legg Creek Page J-212

This is a winter range for bighorn sheep. Mineral activities should be prohibited here. All activities which would disturb wintering sheep should be controlled. **69**

150 Logan/Dunn/Trout Page J-214

This area contains crucial winter ranges for both elk and sheep. Further, it is adjacent to the very crucial winter range for bighorn sheep on Jim Mountain. For these reasons we feel that the logging proposed here should not be done. Failing that, roads associated with this logging should be closed to the public. **70**

152 Pearson Page J-216

The unit should have crucial elk winter range shown. There are about 100 head of elk wintering here. **71**

153 Rattlesnake Page J-218

We recommend that no logging occur here until after adjacent lands administered by BLM have been reforested. The BLM lands have been severely **72**

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97-66 There is no domestic sheep grazing on the Deer Creek Analysis area. Mineral activities on the Deer Creek Analysis area will be restricted from December 1 to June 30. All seismic activity within the area will be conducted in conformance with the approved Environmental Assessment entitled Geophysical Investigations for Nonwilderness and Nonprimitive Areas of the Shoshone National Forest.

97-67 The Forest Plan shows no extensive timber sales in the Blackwater Creek and Green Creek area. During the first decade the District plans to sell approximately 200 MBF of small Ranger Sales District-wide consisting of post and poles, fuelwood, thinning, house logs, salvage and personal use Christmas trees. The sales in the Blackwater and Green Creek areas will utilize the existing road systems and skid trails. No road construction is anticipated in the first decade.

The area was proposed as 2A to provide access to the Wilderness boundary rather than closing the road one mile away during the summer months. The reader correctly points out the importance of the 5A area for elk management with its seasonal restrictions of vehicular use. There is and will continue to be closures to snowmobiles and other vehicles during the fall-winter-spring season up the entire Elk Fork drainage. Therefore to provide summer access, the area will need to remain 2A, but snowmobiling will not be permitted.

97-68 See response to comment 97-65.

97-69 The decision to lease or not lease pending applications within this area will be addressed in the South Fork Lease Group Environmental Analysis.

97-70 In the Forest Plan there are no timber sales planned in the Trout Peak area in the first decade.

97-71 See response to comment 97-65.

97-72 There are no planned timber entries in this area requiring any extensive roadwork for the next 50 years.

Comment 97

Forest Service Response

FRD- 17- W- L - C

Mr. Dick Hartman
September 23, 1985
Page 19 - EIS 2736.

burned and in recent years, heavily logged. The general area will not presently hold elk during the hunting season due to the shortage of security cover. | 72

154 Rock Creek Page J-220

This unit is an important winter range for elk, deer and about 150 antelope. There should be some crucial winter range listed here for elk. The area is located such that the public does not have access in winter, so the area provides security to wintering wildlife. Reserving 10% of the forage will not support numbers of wintering wildlife currently using the area. | 73

97-73 See respone to comment 97-65.

157 Jim Mountain Page J-224

This unit is a very crucial area for bighorn sheep. It is yearlong range for a few animals and a crucial winter range and lambing area for large numbers of sheep. The unit should have mineral activity restricted. | 74

97-74 We believe your concern is valid and intended minerals management has been re-addressed in Appendices J and K in the Forest Plan.

Ishawooa Transportation Page J-229

Mineral activities should be restricted in elk and sheep winter ranges and birthing areas. | 75

97-75 They are.

Appendix K

On page K-3 there is a lengthy discussion of surface occupancy restrictions that apply to crucial winter range, but there is no provision for no surface occupancy stipulations. To allow any loss of crucial winter range due to surface disturbance is in direct conflict with Forest Plan goal number 6 under Wildlife and Fish page III-6 of the plan "Improve and maintain the quality of habitat in winter range on the Forest." It is stated in the plan and pretty well accepted that available winter range is the primary factor limiting most big game herds summering on the Shoshone National Forest. We cannot afford any loss of winter range on public lands because of losses occurring on private lands. Crucial winter range makes up a minor percentage of the Forest open to minerals development in the Lander and Wind River Ranger Districts. The minor impact a no surface occupancy stipulation for crucial winter ranges would have on the minerals industry would be more than offset by the protection it would provide the Forest's "major values" wildlife, beauty, and recreation. | 76

97-76 We agree that losses of crucial winter ranges cannot be condoned; however, restrictions placed on minerals activities in these areas we believe will prevent such losses.

Management Area Map for the Alternative D Land and Resource Management Plan:

It is apparent from review of this map that nearly all of the non-wilderness areas on the Forest are planned to be managed under prescriptions 7C, 7E, 7F, 2A, 2B, or 9A and not 4B, 5A, or 5B. This is fine | 77

97-77 See response to comment 97-9.

Comment 97

Forest Service Response

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Mr. Dick Hartman
September 23, 1985
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as long as adequate standards and guidelines are incorporated in the prescriptions to ensure wildlife requirements. For this reason, we feel it is important that the recommended open road densities provided in the Roading Concern section of this comment be listed as standards for Transportation System Management Activities in all the above prescriptions. In the present plan, no standards and guidelines are included for this activity under prescriptions 7 and 9, and the standards presented for prescription 2 will not provide suitable elk habitat. **77**

Along these same lines, the Silvicultural Examination and Prescription Management Activity for Prescriptions 2, 4, 5, 7, and 9 needs to list a standard of 600' of cover as a minimum buffer between created openings and adopt the recommended minimum stocking standards to determine when a created opening is no longer an opening, as presented earlier. Incorporation of these standards into each of these prescriptions will ensure that wildlife interests are adequately protected on non-wilderness portions of the Forest managed under direction provided by prescriptions 2, 7, and 9. **78**

97-78 The standard found on page 3-173 1.a. of the Proposed Plan is changed to read "on diversity units dominted by forested ecosystems ..... should be a least 600 feet wide".

The crucial winter ranges omitted in A.A. 94, 98, and 99 in the Lander Ranger District need to be incorporated on the map as prescription 5A or 5B areas as described in the Appendix J comments. **79**

97-79 Crucial preferred winter ranges were the areas shown on 5A or 5B, not the larger "crucial" winter range areas. The maps of the Lander District jointly prepared by the Wyoming Game and Fish and Forest Service biologists did not contain any CPWR except for one small area for bighorn sheep on the Little Popo Agie; this has been changed to 5A.

Grizzly Bear

From the standpoint of the grizzly bear population, the preferred alternative, Alternative D would be best, with Alternative B having the greatest impacts and most negative effects on the grizzly bear.

The Situation Management Areas of the Guidelines for Grizzly Bear Management in the Greater Yellowstone Area (guidelines) are outdated. The forest plan should include current situation management lines. As just one example, at present, most of Elk Fork Drainage is shown as Situation 5, a classification that denotes areas devoid of grizzlies. This area has high grizzly bear activity and recent data indicates it is an important spring use area for grizzlies.

The Forest Plan calls for a significant amount of timbering in the next ten years in the Clark's Fork District. The non-wilderness areas of this district have been heavily cut in past years. The cuttings proposed for the next decade include Lodgepole Creek (1985), Reef Creek (1985), Pilot Creek (1985), Spring Creek (1985), Squaw Creek (1986), B-4 No. 2 (1986), Table Mountain *1986), Paint Creek (1987), Oliver Gulch (1987), Russell Peak (1988), Cathedral Cliff (1987), Ghost Creek (1989), Upper Lodgepole (1990), Russell Creek (1991), Hardee (1991), Dead Indian Gulch (1992), Company Creek (1992), Little Sunlight (1992), Washout (1992), Basin (1992), Trail Creek (1993), Table Mountain (1993), Beam Gulch (1994), **80**

97-80 See additional standards and guidelines for timber activities is Grizzly bear Situations I and II.

Comment 97

FRD-97-W-L-G

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September 23, 1985
Page 21 - EIS 2736.

Gravelbar (1994), and Russell Creek No. 2 (1994). A certain amount of timbering is beneficial to grizzly bears by opening up the overstory and increasing the production of understory shrubs and forbs that are bear foods. However, grizzly bears also require mature timber stands for security/escape cover and daybed sites. They retreat to these areas when disturbed and even though some areas have good bear food production, there may be little bear use if there is no interspersion of mature timber. The Forest Plan calls for cuttings of such high frequency and intensity that grizzly bear use of the Clark's Fork District may be severely reduced in the next decade. 80

Secondary to the timbering is an intensive plan of road building to create access for timber removal. New roads will be built for all-weather access, then closed after timbering and firewood cutting. In addition, some roads presently accessible on a seasonal basis will be upgraded to all-season roads and then closed after timbering and firewood removal. Since barriers will be placed on these roads with "grizzly bear management" as the justification, a public relations problem and backlash against grizzly bears is likely to result. In the past, roads were built to minimum standard necessary to remove timber, then graded shut. The present philosophy is that instead of rebuilding these roads every 10 years, a high standard road should be built complete with steel bridges, heavy excavation, heavy aggregate base and fine aggregate surfacing. Without constant maintenance, these roads develop washouts and deteriorate to an unuseable state in ten years anyway. We feel an intensive network of new or upgraded roads in Situation I and II grizzly bear areas, in addition to short rotation, complete coverage timbering will have a significant negative impact on grizzly bear in the Clark's Fork District of the Shoshone National Forest. 81

Pg. IV-31 - Based on Table IV-10, no acres of enhancement are planned for Grizzly Bear Habitat under Alternative D (preferred). The plan predicts that slow recovery will occur over the 50 year planning region without habitat enforcement. This approach is probably too conservative in light of the current low grizzly bear population. 82

We did not find within the D.E.I.S. or Proposed Plan any reference to plans for reducing the number of hazardous waste sites, pollution sources, abandoned mines or other damages to aquatic riparian habitats. Reclamation of these sites is recommended as it would benefit fisheries, esthetics and water quality. 83

Literature Citations:

Hoover, R.L. and D.L. Wills (Ed.). 1984. Managing Forested Lands for Wildlife. Colo. Div. of Wildl. 459 pp.

Hepworth, W. 1979. Big Game Forage Requirements. Letter to BLM Dist. Mgr., Worland, WY.

Forest Service Response

97-81 Since the grizzly is a nationally threatened species, management will be performed in accordance with provisions of the Endangered Species Act. This will include biological evaluations and formal consultation as necessary to insure that activities are not likely to jeopardize the continued existence of this species. The Wyoming Game and Fish will be contacted for input on specifc projects. Road standards, maintenance, and management will be in accordance with the "Grizzly Bear Guidelines".

97-82 DEIS, Table IV-10 references acres managed according to prescription 4F found in EIS, Appendix G. This prescription would have resulted in drastic reductions or exclusions of other multiple use activities such as grazing, outfitter operations, developed recreation, and mineral exploration and developments as well as provisions for large scale acquisition of private lands. Such drastic measures were not deemed necessary to acheive recovery.

97-83 To our knowledge, there are no hazardous waste sites on the Forest. Our coordination with DEQ has revealed no such problem areas.

There are numerous references to watershed problem areas on the Shoshone National Forest to be found in the documents. We direct your attention to Chapter III in the DEIS (or FEIS) under water (specifically water quality) and soils. See also Chapter IV in the DEIS (or FEIS) under Water Resources and Soils. We also refer you to the Plan, blue pages under Water Resource IMprovement and Maintenacne, General Direction 4. Also, Appendix G of the draft and final Plan provides a watershed problem assessment and a listing of sites where we intend to implement improvement activities. These improvements would benefit soils, riparian and aquatic resources.

Coment 97

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Please forward these comments to the appropriate Forest Service officials and contact us at this office or our respective District Game Division or Area Fisheries offices in Cody and Lander if we may be of further help on this project.

Sincerely,

Francis Petera

FRANCIS PETERA
ASSISTANT DIRECTOR
OPERATIONS

FP:HBM:sac
cc: Game Div.
Fish Div.
HATS Div.

best copy available

Comment 97

Forest Service Response

THE STATE OF WYOMING

FFD - 97 - W - t - G
Proj. No. Org. Type Loc.

ED HERSCHLER
GOVERNOR

Department of Environmental Quality

Water Quality Division

HERSCHLER BUILDING CHEYENNE WYOMING 82002 TELEPHONE 307 777-7781

MEMORANDUM

TO: Director, DEQ

FROM: Michael A. Carnevale, Planning Supervisor

DATE: September 6, 1985

SUBJECT: Water Quality Comments on Draft Environmental Imput Statement
Shoshone National Forest

VI-290

This office has been in contact with Bob Rossman who prepared the soil and water reactions of the DEIS and Proposed Land and Resource Management Plan. Bob has been extremely helpful and has incorporated many of our suggestions into the documents. Because the Water Quality Division and Shoshone National Forest staff shared information early in the process of plan development, we have fine comments at this time as most of our concerns have been addressed and are incorporated into the document.

The following constitute the specific comments offered by the Water Quality Division on the DEIS:

1. Page II-63. THe first two sentences of the second paragraph states "Average water yield increases resulting from vegetation management increase in all alternatives except E, due to the larger reduction in timber management. Sediment increases generated by higher water yields will increase or decrease accordingly." **84**

   We do not believe a water yield increase will ever result in a decrease in sediment yield. When would a higher water yield result in a decreased sediment yield? How would yields decrease accordingly? The second sentence requires clarification.

   The paragraph further states that "Some management activities produce additional sediment without increasing water yield. Sediment increases shown in Table II-8 represent the combined effect of channel sources and increased erosion from selected management practices on adjacent lands. Computation of sediment increases involves only an estimate or an index based upon roads, vegetation management, and domestic grazing. There is insufficient data available to estimate potential sediment yields from oil and gas related activities; therefore the table does not reflect any potential increases from that source." **85**

97-84 We agree this statement is confusing and we reworded it accordingly. We wish to convey that sediment yeilds are directly proportionate to water yields. Increases in water and sediment vary by alternative over time. Water or sediment yield increases (quantity produced above normal) are compared in a relative sense to water or sediment increases produced later in time or in other alternatives.

97-85 It is implicit in the statement, as written, that sedimentation results from ground disturbing activities associated with oil and gas. We are drawing a distinction here in regard to our analysis of discretionary Forest Management activities versus activities of which we have no knowledge in terms of location or intensity.

You are correct in pointing out the availability of methodologies for estimating yields of sediment. We used such methods to arrive at coefficients for water and sediment yields resulting from defined, scheduled and located forest management practices. However, without a knowledge of location, intensity and scheduling of oil and gas activities, we would be forced to make separate detailed assumptions for analysis areas on fifty percent of the Forest. The lack of sufficient information to which we refer is that of specific locations of oil producing subsurface structures and oil industry intent for development. For these reasons, the analysis suggested is beyond the scope of this document.

Please refer to Plan, Appendix K, where the process for analysis of oil and gas leases is explained. Future proposed leasing or associated activities would receive full scrutiny under the NEPA process. Within

FPD-97-W-1-G
Proj. No. Orig Type Affil

While the DEQ does not disagree with this statement, we would like the last sentence reworded to reflect that sediment yield is bound to increase on any disturbed sites including those occupied by oil and gas exploration and/or production. Further, we are curious as to why the data was insufficient to estimate potential sediment yields from oil and gas related activities. Methodologies are available to estimate yields from disturbed sites. If the Forest Service is unsure of where and to what extent oil and gas activities will occur on the Forest, this should be clearly stated. Perhaps an estimate of sediment yield based on a worst case situation sould be made and included in the Final EIS.

The second paragraph concludes: "Sediment yields decrease in alternatives C, D and E and remain nearly the same in the others. The large decrease in C is associated with deemphasis on all activities that produce sediment such as livestock grazing, timber harvest and quality. The yield decreases in E simply because of budgetary limitations on engaging in such activities. Increases in potential sources of pollution, both concentrated and dispersed, cause an increased risk of cumulative impacts on water quality, wetlands and floodplains. These risks are associated with commodity production and road densities over the current trend. The risk would decrease in all alternatives because of lower commodity production and because of the application of more stringent restrictions on oil and gas operations in Alternatives C and D."

85

We believe that the Forest Service assessment is basically correct and that the preferred alternative (D) and alternatives C and E offer the greatest protection to water quality.

2. Page III - 55. The Water Quality section found on this page mentions inadequacies in the water quality monitoring program operated by the Shoshone National Forest. Adequate water quality monitoring is necessary to determine the impact of various activities occurring on the forest and enables resource managers to make informed decisions regarding resource uses. Therefore, funding for an adequate monitoring program should be aggressively pursued.

86

97-86 The Shoshone Water Resource Monitoring Plan is incorporated by Reference in the Forest Plan. The costs of implementing have been included both in the fixed cost portion of the planning model and in the directly entered prescriptions which represented choices for the various alternatives. The separate cost entries reflect the separate objectives as put forth in the monitoring Plan.

The budget process will be tied to the Forest Plan. There will be a need, however, to responsibly allocate funds received by the Forest to the appropriate task as defined in the Plan. Please refer to Plan, Chapter IV, Table IV-1, under Water Resources.

Comment 97

Forest Service Response

FPD-97-W-L-C

Ed Herschler
Governor

Wyoming State
Archives, Museums & Historical Department

Barrett Building | State Historic Preservation Office | Cheyenne, WY 82002

Robert D. Bush, Ph. D.
Director
307-777-7519

August 1, 1985

AUG 6 1985

Mr. Dick Hartman
State Planning Coordinator
Herschler Building
Cheyenne, Wyoming 82002

RE: §Shoshone National Forest Land and Resource Management Plan DEIS (85-201)

Dear Mr. Hartman:

Our staff has reviewed the DEIS. We cannot make any specific assessments on the various alternatives potential effects on cultural resource sites and have no preference for one or another of the alternatives. As discussed in the DEIS, specific projects or actions are subject to 106 review by SHPO and the ACHP. We will provide comments on a project specific basis as they occur.

Sincerely,

Mark Junge

Mark Junge
Deputy SHPO

FOR:
Dr. Robert D. Bush, Ph.D.
State Historic Preservation Officer

MGJ:RLB:klm

No response necessary

Frank Bowron, Chairman, Casper | Lucille Dunkrill, Vice-Chairman, Newcastle | Bill Bruce Hines, Gillette | Thomas J. Mangan, Laramie | Gladys G. Hill, Douglas | Mary Sawyer, Kemmerer | Dave Pantley, Cheyenne | Mary Gutkrie, Cheyenne | Marion Baragrover, Worland

Comment 97

Forest Service Response

85-201

FFD-97-W-L-G

Proj. No.

STATE OF WYOMING
OFFICE OF THE GOVERNOR
CHEYENNE 82002

ED HERSCHLER
GOVERNOR

MEMORANDUM

TO: Paul Cleary

FROM: Rod Miller RM

DATE: July 19, 1985

SUBJECT: Shoshone Forest Plan

My only comment on the range components of this plan would be to encourage USFS to explore management strategies to protect, enhance and improve ripirian areas that do not rely solely on fencing. Ongoing U.W. research regarding ripirian zone management is indicating that other methods such as beaver management, man-made instream structures and even intense grazing management contribute to enhanced ripirian zone conditions. Given the extreme costliness of fencing, approximately $3,000 per mile, these methods may prove more cost effective and certainly would be less controversial than total exclosure.

lf

87

97-87 We feel that fencing is a viable management tool in protecting riparian areas that are critical or limiting to wildlife, aquatic life and water quality. Cost effectiveness is certainly a consideration in any project; in this case we must weigh in the costs associated with the potential loss of fragile riparian/aquatic resources. If it is determined that these resources can be maintained or enhanced through some other means at lower cost, we will pursue that course.

In viewing the U. W. research, we maintain that those measures listed are suitable for riparian zones that are already disturbed to a significant degree (for example: loss of vegetation, expansion of channel width, decreasing channel depth, free movement of sediment through the system terracing, etc.). Our goal is to protect riparian areas before they are impacted to such a degree as to require such treatments.

Comment 97

Forest Service Response

FPD- 97- W- L- G
Proj. No. Orig. Type [illegible]

State of Wyoming
Oil and Gas Conservation Commission

GOVERNOR ED HERSCHLER, CHAIRMAN
COMMISSIONERS
HOWARD M. SCHRINAR GARY B. GLASS MARVIN A. KELLER BERN WHITTAKER
STATE OIL AND GAS SUPERVISOR
DONALD B. BASKO

August 2, 1985

Mr. Dick Hartman
State Planning Coordinator
Wyoming State Clearinghouse
2320 Capitol Avenue
Cheyenne, WY 82002

Re: The Shoshone National Forest Land and Resource Management Plan, State Identifier 85-201

Dear Mr. Hartman:

I am in receipt of three volumes of the above-noted management plan, two of which encompass a huge amount of detail. My only concern is that the Forest Service, by their own evaluation, rates a fairly large area of the Shoshone National Forest as having unknown potential for oil and gas through areas of high potential with intermediate grades. I would certainly hate to see the Forest Service the the position that would make it difficult or impossible for oil and gas operators to evaluate some of the more promising lands that even the Forest Service recognizes. **88**

Certainly we would be willing to work with the Forest Service in any way possible, should exploration take place, and, as usual, enforce our rule regarding blowout preventer equipment stringently.

Very truly yours,

Donald Basko

Donald B. Basko,
State Oil and Gas Supervisor

DBB:wal

97-88 See response to comment 68-5.

777 WEST FIRST STREET, P.O. BOX 2640, CASPER, WYOMING 82602 (307) 234-7147

FPD-97-W-L-P
Proj. No. Org Type Appl

THE STATE OF WYOMING

ED HERSCHLER
GOVERNOR

Water Development Commission

HERSCHLER BUILDING TELEPHONE: 307-777-7626 CHEYENNE, WYOMING 82002

Michael K. Purcell
Administrator

September 16, 1985

James Noble
Chairman
J.W. Myers
Vice-Chairman
William Glanz
Secretary
Myron Goodson
Walter J. Pilch
Willard C. Rhoads
Meri Rissler
Kathleen Sun
Nelson E. Wren, Jr.

Mr. Dick Hartman
State Planning Coordinator
Wyoming State Clearinghouse
Herschler Building
Cheyenne, Wyoming 82002

Re: 85-201. Shoshone National Forest Land and Resources Management Plan

Dear Dick:

The primary concern of the WWDC with the proposed Forest Plan is the continuation of management of the Clarks Fork Canyon for Wild and Scenic status (Page III-9, III-20, III-21). The Commission is on record as being opposed to Wild and Scenic designation as indicated in the enclosed resolution. Dropping of goals and objectives in the Forest Plan relating to Wild and Scenic designation would be preferable to the Commission. **89**

Sincerely,

John W. Jackson
for Michael K. Purcell
Administrator

MKP/CNG/vsb
Enclosure

97-89 Our direction in the Forest Plan preserves the option to include this outstanding river segment in the National Wild and Scenic River System. The direction also preserves the option of studying the River and its capabilities in terms of development. Actual development would foreclose on the former option, whereas Congress could act at anytime to declassify the river if an overwhelming need should arise.

The FEIS evaluating the wild and scenic proposal surfaced no overwhelming public need for development within the corridor. All comments we have received in this effort run to the contrary, citing economic, biologic, social and aesthetic criteria for leaving that portion of the River undeveloped. Many respondants also feel that development opportunities could be implemented while leaving the wild river segment eligible for inclusion in the National System. See also the response to comment 13-1.

Comment 97

EIS-97-W-1-C
Proj. No. Orig Typo Artil

WHEREAS, the State of Wyoming is allocated sixty percent of the waters of the Clarks Fork Basin by the Yellowstone River Compact, an amount estimated to be in excess of an average of 400,000 acre-feet per year;

WHEREAS, the development of Wyoming's allocated portion of these waters in a prudent manner at reasonable cost may require construction of water resource projects on the Clarks Fork River and its tributaries in an area being considered for wild and scenic designation; 89

WHEREAS, the State of Wyoming and the State of Montana are developing a joint committee to discuss water management issues common to both states;

NOW, THEREFORE, Be It Resolved by the Wyoming Water Development Commission that it urges the Wyoming Congressional Delegation to oppose any Congressional action which could restrict Wyoming from developing its water allocation under the Yellowstone Compact.

FFD-97-W-L-G SEP 5 1985
Proj. No. Orig Type Aff.

DIRECTOR AND STATE GEOLOGIST
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RICHARD W. JONES -COAL
ALAN J. VER PLOEG -PETROLEUM

LABORATORY TECHNICIAN
JAY T. ROBERTS

MEMORANDUM

To: State Planning Coordinator
From: Gary B. Glass, State Geologist;
W.D. Hausel, Deputy Director;
Ray Harris, Uranium and Industrial Minerals Geologist;
Jim Case, Environmental Geologist
Subject: Land and Resource Management Plan, Summary, and Draft Environmental Impact Statement, Shoshone National Forest (State Identifier No. 85-201)
Date: September 3, 1985

We have reviewed the three documents listed above and make the following comments:

Draft Environmental Impact Statement (DEIS)

Page D-43 - Why aren't the mineral potential maps for the Shoshone National Forest, which are discussed in the DEIS, not included? There is a map for oil and gas, but there is nothing for any other mineral.

Page D-41, etc. - We generally agree with the overview of the mineral potential of the Shoshone National Forest as outlined in the DEIS beginning on page D-41, however, since its publication in 1982, an overview of Mesozoic and Cenozoic paleo-gold placers by Phillips (1985) indicated a potential resource of 3.55 billion ounces of gold in northwestern Wyoming. Only a portion of these gold-bearing conglomerates and sandstones occur in the central Shoshone National Forest, but these should be considered as high potential. On page D-52 of the mineral report, they are only briefly mentioned, but the report should be updated to include Phillips (1985) overview. [Phillips, C.H., 1985, Intermountain gold anomaly-significance and potential: Engineering and Mining Journal, May, p.34-38].

Page D-50 - This discussion gives a minimum estimate of gold production from the South Pass-Atlantic City District as 70,000 ounces. The higher estimate of 325,000 ounces (Hausel, 1980) should also be included in the gold production statistics. Because of the lack of published information

90 97-90 The Appendix D should show that the minerals maps were incorporated by reference. These maps are located at the Supervisor's Office. The Phillips and Hausel information would be a good addition to this data base. Since this is a continuing planning effort we would appreciate any new information that may become available.

Comment 97

Forest Service Response

FPD-97-W-2-G
Proj. No. Orig Type Area

State Planning Coordinator

September 3, 1985
Page 2

in the historic literature, no production estimates are available for the Lewiston gold district. Available historic reports indicate that the Lewiston District contained several rich (but spotty) gold deposits. Since the DEIS discussion was written in 1982, it should be updated to include some discussion on Lewiston. We have a paper in press on this, but W.D. Hausel of our staff could provide information to the Forest Service now (Hausel, in press). [Hausel, W.D., 1980, Gold districts of Wyoming: Geol. Survey of Wyoming Report of Investigations 23, 71 p.; Hausel, W.D., in press, Geology and gold mineralization of the South Pass granite-greenstone terrain, western Wyoming: Utah Geological Association Guidebook.] **90**

Land and Resource Management Plan

Page II-64 - The Plan states that the mineral potential of the Shoshone Wilderness is "completely" discussed in U.S. Geological Survey Professional Paper 1300. We do not believe the "extended abstracts" published in this Professional Paper qualify as "complete" discussions. Why didn't the Plan cite the documents or reports upon which the "abstract" was based? **91**

97-91 We believe the incorporation by reference is adequate.

Page II-66 - On this page the Plan states that deep well drilling in the Forest could affect the geothermal springs in Yellowstone National Park. What is the evidence or citation for this statement? **92**

97-92 This concern was expressed by the National Park Service specifically at a Greater Yellowstone Coordinating Meeting. They are currently doing studies relative to this issue.

Appendix J - Why aren't there any expressed statements on "Minerals Management" for the following Management Units: 110, 159, 160, 164, 181-184, 186-192, 194, 196, and 197? Why don't the discussions on Management Units 108, 109 and 148 explain the reasons for eliminating all mineral activity? **93**

97-93 Appendix J has been updated to include discussions of mineral activity on all units. The statement in Appendix J for analysis areas 108, 109, and 148 that mineral operations are prohibited are in error. Unless portions are specifically withdrawn they are available and leasing would be considered as outlined in Appendix K of the Forest Plan.

Page II-93 - We seriously doubt that the non-surface-occupancy rule as proposed in Alternative D will allow adequate exploration activity for locatable minerals such as metals. **94**

97-94 The NSO stipulation is applied primarily where an activity could violate soil and water minimum standards. Each proposal is considered on a site-specific basis and if appropriate measures can be taken in high hazard soil and water areas, then something less restrictive would be recommended to the Bureau of Land Management. See Appendix K of the Forest Plan. NSO does not apply to locatable minerals.

Page II-95 and II-96 - According to the Plan, the only "research need" that relates to minerals is an acoustical study of seismic exploration to determine the effects of noise on humans. We believe there is also a need for more detailed studies of the mineral resource potential of these areas. Detailed geologic mapping and detailed studies of mineral occurrences are lacking for much of the Shoshone National Forest. **95**

97-95 We agree that more detailed information relative to minerals potential would be helpful. If all minerals activities, not just oil and gas, continue to increase then this would certainly become an issue and concern that would merit additional studies.

Summary Report

The Summary Report mentions the withdrawal of 549,000 acres from surface occupancy for oil, gas, and mineral exploration. Because this kind of withdrawal would greatly limit, if not end, exploration and development activities **96**

97-96 The acreage of NSO in question has been mapped on a fairly broad scale and are available at the Supervisor's Office. Before decsions will be made on these lands regarding NSO, they will first be analyzed on a site specific basis as outlined in Appendix K. Limited occupancy may be recommended if the proposal demonstrates that soil and water standards or other critical values will not be violated.

for most minerals, it would be useful to have a map showing the relationship of these 549,000 acres to mineral potential. This acreage is approximately one-fifth of the total forest acreage. **96**

Overall comment

We found no mention of geological hazards (landslides, seismicity, shrinking-swelling clays, etc.) in any of the documents. These hazards can affect so many other activities in the Forest that they are crucial factors for any planning. How is the Forest Service addressing these hazards in their plan? **96a**

97-96a Geological hazards such as those mentioned are implicit in interpretations that have been made regarding water and soil hazard. A more comprehensive list of hazards existing on the Forest would include flooding, avalanches, debris flows and surface creep. General direction and standards and guidelines (Chapter III of the Plan) for Water Resource Improvements and Maintenance (F05 and 6), Soil Resource Management (KA1) and Minerals Management (G02 through G07) provide for consideration of such hazards when management activities or capital investments are proposed. See also Appendix K of the Plan which deals more specifically with soil and water (geologic) hazards in relation to proposed minerals activities. Similar criteria are to be used when assessing hazards for road construction, recreation developments and timber sales.

Comment 97

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THE STATE OF WYOMING

ED HERSCHLER
GOVERNOR

WYOMING RECREATION COMMISSION

122 WEST 25TH-HERSCHLER BLDG CHEYENNE, WYOMING 82002

ALVIN F. BASTRON, P.E.
Director
777-7686

September 12, 1985

Mr. Dick Hartman
State Planning Coordinator
Wyoming State Clearinghouse
Herschler Building
Cheyenne, WY 82002

RE: 85-201

Dear Mr. Hartman:

The Draft Land and Resource Management Plan and Draft Environmental Impact Statement for the Shoshone National Forest was received by the Wyoming Recreation Commission (WRC) on July 2, 1985. Thank you for the opportunity to participate in this review process.

The Shoshone National Forest represents a vast, largely unspoiled resource of which outdoor recreation is an important use. Because of its location, the forest serves as both a buffer and a "bedroom community" to Yellowstone and Grand Teton National Parks. The WRC kept this unique feature of the forest in mind in reviewing the draft forest documents.

The Forest Service is to be commended for preparing a comprehensive and informative study on the direction of future management and planning on the Shoshone National Forest. For the most part, the Preferred Alternative D (i.e., the Draft Forest Plan) represents a balanced approach for managing the forest in that it does not emphasize certain forest uses to the exclusion of other uses. In terms of accommodating developed and dispersed outdoor recreation needs, the proposed plan appears to offer a better balance than most of the other identified alternatives. While the WRC is generally supportive of the proposed Forest Plan, it cannot wholeheartedly endorse the plan until the concerns raised in this letter are adequately considered in the review process.

A major criticism of the proposed plan is that it does not accurately reflect the demand for developed recreation or the existing capacity for developed recreation on the forest. Recent data from the 1985 Wyoming Comprehensive Outdoor Recreation Plan Draft (SCORP) indicates by 1990, a 97

Forest Service Response

97-97 While total capacity is adequate, several new sites are proposed to distribute use more effectively during the peak season and to protect currently undeveloped sites that are receiving considerable activity.

We do not believe that the Wyoming State Comprehensive Outdoor Recreation Plan (SCORP) and the Forest Plan should be compared for purposes of determining correct demand and capacity because the scope of the SCORP is so much more inclusive. We do not think they are in conflict. We have included the SCORP into our document by reference. The Forest Service was aware of SCORP data when it made its demand estimates for developed recreation. Demand conditions will be re-evaluated during the next ten years.

Data relating to Buffalo Bill State Park and Boysen State Park have been modified. The typing error in Proposed Plan, table II-5 has been corrected. Appendix J of the Proposed Plan contained descriptions of the nature of developed recreation site construction. This information is summarized below.

ANALYSIS AREA	TYPE OF DEVELOPMENT	WHEN
002-Basin	Develop Overlook at Sunlight Bridge	1st Decade
007-Lake Creek	Construct Campground at Lilly Lake	2nd Decade
007-Lake Creek	Snowmobile Parking and Restroom-Beartooth Hwy.	1st Decade
026-Beartooth Highway	Implement Beartooth Highway Visitor Info. Plan	1st Decade
042-Gooseberry	Construct 30 Unit Campground - Brown Creek Flat Area	1st Decade
091-Bayer Mtn.	Construct 20 Unit Campground and 10 Unit picnic ground - Snow Creek Basin	2nd Decade
100-Shoshone Lake	Construct 40 Unit Campground at Shoshone Lake	3rd Decade
114-Louis	Construct 10 Additional Units - Popo Agie Campground	2nd Decade
182-Fish Lake	Construct 1 Campground - Warm Springs Creek	1st Decade
189-Whiskey Mtn.	Construct Trailhead at Torrey Creek	1st Decade
191-Wind River	Potential for 24 Unit Campground at Brooks Lake	1st Decade

pages tightly bound

Comment 97

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need for more developed campsites will become apparent in all counties which contain a portion of the Shoshone National Forest except Sublette County. These needs can be considered as conservative since they are only based on resident use characteristics and do not take into account the considerable non-resident use that occurs. As such, SCORP data is in conflict with the Forest Service's contention that developed recreation capacity on the forest will exceed projected use throughout the 50 year life of the Forest Plan. (As a suggestion, the Forest Service may wish to incorporate 1985 SCORP data into their planning efforts. The data include quantitative and qualitative information on outdoor recreation demand and needs for each county in Wyoming. The SCORP data could be used to supplement the Forest Service's recreation information and may provide the rationale for making some modifications in the overall strategy of the Forest Plan. The WRC would be glad to provide the Forest Service with any recreation information they feel they could use).

Both the Draft Environmental Impact Statement and the proposed Forest Plan state that the 1980 developed recreation capacity on the forest will exceed projected developed recreation use throughout the entire 50 year planning period (DEIS, pp. IV-17; Draft Forest Plan, pp. II-32). While this statement may be true if capacity and use estimates are compared on an annual basis, it does not always hold true for individual days. In fact, most developed recreation sites on the forest are filled to capacity on weekends during the entire summer season. This situation indicates a need for additional developed recreation capacity, if only on a seasonal basis. 97

In discussing developed recreation capacity estimates, it is not clear whether the proposed plan is referring to managed capacity or total design capacity. If the reference is to total design capacity, projected developed recreation use could conceivably surpass the capacity these sites are actually managed for.

While it is true that there are other developed recreation sites located within and adjacent to the forest that are administered by other entities such as the WRC, BLM, and the private sector, the developed recreation capacities for some of these sites as stated in the proposed plan appears too high. This is particularly true of Buffalo Bill and Boysen State Parks. One page II-29 of the proposed plan, it is stated that Buffalo Bill State Park provides 200 camp and picnic sites with a capacity of 1000 people and that Boysen State Park provides 323 camping and picnic sites with a capacity of over 1600 people. In actuality these capacity estimates are much too high since Buffalo Bill State Park only has approximately 94 camp and picnic units while Boysen only has 167 camp and picnic sites.

The proposed Forest Plan concedes that the development of some new developed recreation sites will be necessary during the planning period and in fact allows for the development of three additional recreation sites (proposed Forest Plan, pp. II-88). However, the plan provides no additional information regarding the nature, location or time frame for the development of these sites.

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Forest Service Response

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Mr. Dick Hartman
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Although the proposed Forest Plan contends that developed recreation capacity exceeds projected developed recreation use thoughout the entire 50 year planning period, this is not fully supported by Table II-15 on page II-19 of the planning document. The developed recreation capacity objective for the Forest Plan during the period 1991-2000 is listed in the table as being 169,000 recreation days while developed recreation use for the same period of time is projected to be 430,000 recreation visitor days. This apparent discrepancy should be cleared up. **97**

The proposed plan appears to provide a reasonable mix of dispersed recreation opportunities while still accommodating other legitimate forest uses. However, the proposed Forest Plan (Alternative D) would actually provide less money for dispersed recreation facility construction/reconstruction than Alternatives A, B and F (DEIS, Table II-5, pp. II-51). Since dispersed recreation use is rapidly growing and is the major recreation use of the forest, how can this allocation be justified? **98**

The WRC is also concerned about the effect the proposed plan would have on the transportation network of the forest. In regard to miles of road open for public use, it is not clear how the proposed forest plan compares to the other identified alternatives. Table II-6 on page II-58 of the DEIS seems to indicate that of all the alternatives identified only E would have fewer miles of road open to the public than the Preferred Alternative D. Yet, the DEIS goes on to state on page IV-69 that Alternative D (along with Alternative A) would result in the most miles of road open for public use. This apparent contradiction must be resolved. **99**

An important aspect of travel management on the forest concerns snowmobiling. The Shoshone National Forest provides an extensive snowmobile trails network attracting snowmobiling from all over Wyoming and the surrounding states. The trail system consists mostly of roads closed to vehicular traffic during the winter. The WRC plays a major role in providing funds and facilities for snowmobile trail use on the forest. In addition to trail grooming activities, the WRC publishes annual snowmobile brochures with maps depicting the existing trail network. Because of winter logging operations in certain areas of the forest, there have been occasions when roads, which have been identified in the WRC brochure as part of the groomed snowmobile trail system, have been plowed and left open during the winter by logging companies. This creates a potentially dangerous (and illegal) situation where snowmobiles and wheeled vehicles may come into conflict. This problem should be addressed in the Forest Plan. Snowmobiling is an increaingly popular use of the forest and provides important economic benefits to the region and the State. The Forest Service must continue to work with the WRC to insure snowmobiling opportunities remain an integral part of the forest's recreation resources. **100**

97-98 A few specific areas (locations) within Alternatives A, B, and F are designated to be managed more intensively for recreation than what is called for in the preferred alternative. This causes dispersed facility expenditures to be slightly higher in Alternatives A, B, and F.

97-99 In response to numerous concerns, the number of acres managed for timber harvest and the resultant amount of roads has been reduced in the final Plan. In the next fifty years, the Plan projects only eighty miles of new road which will be open to the public. There is projected 120 miles of existing road which will be improved and remain open to the public. An additional 150 miles of new road, and 255 miles of reconstructed existing roads are projected to be closed to the public within the 50 year period. Road construction and reconstruction figures have been corrected. See also response to comments 182-5, 33-9, 80-5, and 44-46. The Forest Plan will guide management over the next 10 to 15 years and will be revised every 15 years or sooner in response to major changes in information or needs of the American public. Projections over 50 years are provided to portray long term consequences only.

97-100 The Forest agrees. Use of a road system jointly by snowmobile and wheeled traffic is dangerous and illegal. These situations are commonly dealt with through location of alternate routes for wheeled vehicles or snowmobiles. These situations are best handled on a site-specific basis with specific analysis for each proposal.

Comment 97

Forest Service Response

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Mr. Dick Hartman
Page 4

Another concern the WRC has with respect to snowmobiling on the Shoshone National Forest relates to the development of the Clark's Fork Snowmobile Trail located along the Beartooth Highway between Cooke City, Montana and the Beartooth Plateau in Wyoming. Currently a section of this trail is closed to snowmobilers due to legal action initiated by the B-4 Ranch. The WRC is hopeful that this litigation will be resolved shortly in favor of the development of this trail section so that an integrated and continuous snowmobile trail system can be provided in this region. If this happens, the proposed Forest Plan should be prepared to accommodate the development of this snowmobile trail section.

101

97-101 This concern is specifically addressed in the text of analysis area 007 in Plan, Appendix J under recreation, page J-31.

A final concern of the WRC relates to the research needs described in the proposed plan on page II-96. In spite of the fact that recreation represents a major and one of the fastest growing uses of the forest, only one recreation research need is identified in the proposed plan. While this research need is a worthy objective, the dynamic nature of outdoor recreation clearly calls for additional research needs. Other recreation research needs that merit consideration would include developing better methodologies for determining use at developed recreation sites; investigating the causes of (and possible solutions to) resource and use conflicts involving recreation; and researching methods of incorporating future recreation trends into management plans.

102

97-102 The suggestions are envisioned as being part of the recreation research needs section at the end of Plan, Chapter II. Adequate methodologies are available for determining use at developed sites, however the recreation trend needs have been added as suggested.

As long as the issues and concerns raised in this letter are adequately addressed in the review process, the WRC sees no additional problems with the draft forest documents and would be in favor of implementing the proposed Forest Plan.

If you have any questions regarding this review, please contact this office.

Sincerely,

Alvin F. Bastron
Alvin F. Bastron, P.E.
Director

AFB/MF/lr

RECEIVED OCT 2 1985

FPO 98 - F - L - B
Proj. No. Doc Area

EQUITOUR

Bitterroot Ranch, Rt. 66, Box 1042
Dubois, WY 82513 Tel. 307-455-2778

COMMENTS ON THE SHOSHONE NATIONAL FOREST PLAN

As a dude rancher and outfitter, the Forest is vital to my operation, to the people who work for me and to the hundreds of guests I take into the Forest every year. The comparative value of recreation in the Forest has increased steadily of late years and all indications are that it will increase even more in the remainder of this century. The future for other industries such as lumbering, mining and ranching is clouded so we need to put more emphasis on the one aspect of the Forest which shows greatest promise.

The actual consumptive use in the form of horse grazing on the Forest by dude ranchers and outfitters is very small indeed compared to the large and growing fees paid and yet despite these very high fees cattle are given priority. Hunting camps and pack trip camps are grazed out so that outfitters must bring feed for their horses into the wilderness. The cost of packing in feed is enormous and it is an onerous job. The high fees we pay should entitle us to feed. Heavy concentrations of cows also ruin camping locations from an aesthetic point of view. Both the general public and the outfitted puplic suffer from too much grazing in the wrong places. 1

Cattle are also allowed to graze on critical winter wildlife habitat which seems a poor use of the Forest since the elk are in great demand and cattle are definitely not. We have a very serious national problem with overproduction of beef in the United States and to subsidize cattle production at the expense of recreation and wildlife does not seem logical. 2

Grazing permits are often handled in a careless way by the permittees and little checking seems to be done. There could be many more cattle in a given area than the plan calls for and no one would know. 3

Legitimate outfitters who are now carrying a heavy load with fees, licenses, insurance and time-consuming reporting requirements are not given protection against illegal outfitters who are able to camp freely in the Forest. These illegal outfitters often have bigger camps than the legitimate ones. The system fosters illegality and defeats its own purpose. 4

I do not understand the reasoning behind authorizing more hunting camps in the Dubois area. There are currently not nearly enough elk licenses given out to keep the exisiting outfitters in healthy economic shape. It would be possible to have more outfitters only if the current emphasis on grazing, lumbering, roads and mining were tilted more in favor of wildlife. At the moment, there is little continuity among legal 5

98-1 In most areas of the Forest where there are established outfitter camps, there is no term permitted livestock grazing. In areas of permitted dual use, utilization will be monitored to provide forage for both uses.

98-2 On crucial preferred winter ranges, needed forage for wintering wildlife population objectives are reserved. Utilization standards for domestic livestock will be lowered to provide for wildlife needs as necessary.

98-3 The intent of the Plan and Forest Service policy is to provide for proper monitoring of all resource uses.

98-4 This problem has received increased attention in the past few years, which has resulted in the successful prosecution of several persons outfitting on the Forest without a permit. Several Supervisor's orders have been issued, and are still in effect, which were designed with an objective of restricting the ease with which illegal outfitters have operated in the past. Law enforcement designed to protect the rights of all legitimate users of the National Forest is recognized in the Plan and will continue to receive emphasis.

98-5 All new propsed commercial outfitter camps have been eliminated. See also response to comment 1-1.

outfitters and very few of them can stay in business for more than a few years. There are too few hunters, too much illegal competition, too short a season and costs are too high. It is not a situation which fosters integrity.

I do not approve of cutting down aspen groves to give the younger trees a chance. It destroys the aesthetic value of many rides which are most convenient to take and the result looks bad for many years. People who visit the Forest are shocked by the destruction and do not understand the need for it. Aspen have survived without the help of the Forest Service for millennia. What we should have is a restocking program for beaver.

The plans to develope more roads work directly against dude ranchers and outfitters. By giving lumbermen a short term benefit, you confer a perpetual scourge on the recreation business.

A fourteen day limit should be enforced in the Forest for non-commercial camps. This would give some protection to legitimate outfitters.

The comment period comes at a time when most people using the Forest for recreation are working very long days every day of the week. They are struggling for their survival and do not have time to comment on your plan in a detailed way. The period should have been extended to allow those who depend most on the Forest to comment more effectively.

The worldwide business of sending people on horseback rides is growing very fast. The competitive position of the Rocky Mountain area is not great and we are losing business all the time. As you will see from the enclosed brochure rides in countries like Ireland and Hungary are much cheaper for someone on the East Coast than rides here. The high dollar makes it even more difficult for us. The Forest Service should be helping those providing recreation here to lower their costs and improve the value of what they offer a customer. European and American guests are unfavorably impressed by campsites covered with cow manure.

It is too bad that a country like Hungary is so far ahead of us in managing its wildlife so as to maximize hunting values as the highest and best use both from an economic and an aesthetic point of view. We are too bound by tradition and unwilling to come to grips with a changing situation.

Sincerely,

Bayard Fox

Bayard Fox

VI-35

98-6 Beaver have been restocked in some areas of the Forest and this management action may be considered for other areas of the Forest in conjunction with the Wyoming Game and Fish Department. Aspen cutting is done in some areas to increase forge production for browsing wildlife. A mix of aspen stands in various stanges of develpment to provide diversity is the intent of the Plan.

98-7 In response to numerous concerns, the number of acres managed for timber harvest and the resultant amount of roads has been reduced in the final Plan. In the next fifty years, the Plan projects only eighty miles of new road which will be open to the public. There is projected 120 miles of existing road which will be improved and remain open to the public. An additional 150 miles of new road, and 255 miles of reconstructed existing roads are projected to be closed to the public within the 50 year period. Road construction and reconstruction figures have been corrected. See also response to comments 182-5, 33-9, 80-5, and 44-46.

98-8 A Supervisor's order restricting occupancy to 14 days at both dispersed and developed areas, and in designated wilderness areas, is in force and is enforced uniformly regardless of the type of Forest recreation user.

98-9 Starting in 1969, input from individuals, groups and other agencies was sought in development of the Plan. This included close coordination with the Wyoming Game and Fish Department and many local citizens. A series of meetings was held in the Spring of 1984 to brief interested individuals, groups and agencies as to how planning was being done. In the fall of that year, the public was invited to inspect all options being considered for each part of the Forest and express their ideas concerning these. As documented in Chapter IV and Appendices B and F of the EIS, many individuals, groups and agencies did participate in these activities and were directly involved as part of formulation and analysis of alternatives.

The public was given ample opportunity to give input on the proposed plan in general and for specific areas. There have been numerous meetings over the last two years involving the Plan all of which were announced in newspapers and on radio stations. Newsletters have been sent announcing availability of personnel and planning materials and inviting concerned parties to get involved.

98-10 It is the intent of the Plan to provide for high quality backcountry recreational experience.

Comment 99

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PETROLEUM ASSOCIATION of WYOMING

PETROLEUM ASSOCIATION OF WYOMING
a division of Rocky Mountain Oil and Gas Association

330 South Center, Suite 115
Casper, Wyoming 82601
(307) 234-5333

Richard T. Robitaille
Executive Director
Wendy H. Frueauf
Associate Director

October 1, 1985

Mr. Stephen P. Mealey
Forest Supervisor
Shoshone National Forest
P.O. Box 2140
Cody, Wyoming 82414

Dear Mr. Mealey:

Re: Shoshone National Forest Draft Plan/EIS

On behalf of the Petroleum Association of Wyoming, a division of the Rocky Mountain Oil and Gas Association, whose members account for more than 90% of the petroleum produced and 90% of the wells drilled in Wyoming, please accept the following comments on the Draft Environmental Impact Statement and Proposed Forest Plan for the Shoshone National Forest.

Before we begin our comments on the plan, we would like to take this opportunity to address the issue of Forest Service leasing recommendations to the BLM. Planning problem #11 cites several issues and concerns pertaining to the exploration and development of oil and gas resources on the Forest. The analysis of this problem includes a brief discussion of leasing, but there is no indication of how the leasing backlog will be handled. The objective of the Forest Service is stated to be management of mineral related activities in a "timely manner", but no time frames are provided. The past track record of the Shoshone National Forest is not exactly one of timeliness with over one hundred oil and gas lease applications currently pending, some over a decade old. Apparently, these Plan documents are not intended to address the disposition of leasing. We urge the Forest Service to take immediate steps to get the leasing process functioning within appropriate and reasonable time frames. 1

In general the Plan proposes a preferred alternative which calls for more stringent stipulations and restrictions on mineral activities. Among the reasons cited for this change in management is that more stringent operating standards are needed to reduce the risk of not meeting minimum quality standards for other resources. We find this reliance on excessive regulation to assure minimum compliance offensive and inappropriate. Implicit to this strategy is the mistaken assumption that oil and gas companies operating on the Forest are not willing or able to conduct activities in a manner that 2

Forest Service Response

99-1 Appendix K of the Plan outlines a process for dealing with oil and gas leases and APD proposals. This process is now being used to decrease the backlog of pending leases as well as dealing with new leasing proposals. Developing lease recommendations to forward to the BLM may require a very short Environment Assessment or an EIS depending on the area and issues raised.

99-2 See response to comment 68-5.

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ensures compliance with minimum standards. We find the imposition of unwarranted restrictions under the guise of environmental protection distasteful and contrary to the goals of multiple use management. 2

Leasing Values

The Plan fails to properly consider the value of the forest's oil and gas resource as a commodity. While Appendix D does attempt to assign lease values, these values are of questionable accuracy. The selected values do not consider other benefits such as royalties, tax revenues or contributions to energy security but merely estimated lease revenues. Even using these questionable lease values, however, the Plan's overall negative effect on oil and gas exploration and development is evident. Under the Preferred Alternative, the total lease value for the decade is estimated at $80.3 million or a 36% reduction from the Current Management Alternative. Even more revealing is the fact that the Preferred Alternative is a 38% reduction from the RPA Alternative and a 41% reduction from the Commodity Alternative. 3

While a laudable effort to establish an oil and gas valuation procedure, Appendix D appears to be an inadequately performed exercise. The procedure is not usefully applied in the Plan itself, an indication that it was completed after the resource allocation decisions had already been made for all alternatives. If minerals were to receive proper consideration as a commodity value, they would not be treated subordinately to other resource values. We strongly suggest the adoption of a plan which provides equal consideration for mineral resources.

Grizzly Bear

The Plan provides that all grizzly bear Situation I habitat lands, which at this time encompass 66,650 acres of the Shoshone National Forest outside of wilderness areas, be recommended as "no lease". Does the plan consider the impact of this stipulation if acreage is doubled or tripled in the future? Is this action based on the assumption that oil and gas leasing will jeopardize the continued existence of grizzly bears, or that it will result in the destruction of their habitat? These are not foregone conclusions. The Forest Service has evidently proposed this action outside of the standard consultation procedure provided for in the Endangered Species Act. This circumvention of the applicable law has eliminated the opportunity to determine whether a proposed activity could be modified or mitigated to eliminate certain consequences. The recommendation for "no lease" in these areas appears to actually constitute a withdrawal under FLPMA. If this is the case, then formal steps are required to be taken by the Forest Service. If a withdrawal is not intended, then please amend the plan to provide clarification. 4

Apparently other uses such as recreation, grazing, and timber activities are not prohibited in Situation I areas, yet they may constitute a greater effect on the grizzly bear. It therefore appears that the Draft Plan has arbitrarily singled out oil and gas leases for more restrictive management without justification.

99-3 See response to comment 68-5 and 100-2.

99-4 The decision to recommend lease denial in Situation I is supported by two environmental analysis documents. In both cases, there were no public comments on these documents which opposed this decision. These documents are the DEIS for Oil and Gas Exploration and Leasing within the Washakie Wilderness and the 1982 Environmental Assessment of Oil and Gas Operations in Grizzly Bear Situation I and II. Further, the decision was supported by the U.S. Fish and Wildlife Service in their formal opinions written for these documents. The U.S. Fish and Wildlife Service recently issued a "no jeopardy opinion" on the Forest Plan. This opinion was partially based on lease denial on Situation I lands.

The decision in the Plan does not constitute a withdrawal for it is a temporary ban on leasing. If Situation I lands were withdrawn, leasing following recovery of the bear would require negation of the withdrawal.

The Plan selected the option of requiring no-lease as opposed to withdrawal because in the event of a recovered grizzly bear population, leasing would again be considered. Further, the cumulative effects studies currently underway might help us understand ways in which oil and gas activities may be accomplished with no effect on the Grizzly. Once the cumulative effects can be predicted, then the Interagency Coordinator Committee could consider the general opening of Grizzly Situations I to leasing and formally consult with U.S. Fish and Wildlife Service.

There are many other resource restrictions in Grizzly Bear Situation I habitat. Timber and grazing operations as well as recreational opportunities are limited in these areas.

Comment 99

Forest Service Response

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Airlift or Nonmotorized Access

The Plan prescribes the severe restriction of airlift or nonmotorized access for "isolated occupancy tracts". This stipulation dramatically reduces the acreage available for leasing due to extreme costs or infeasibility of such mobilization of equipment and manpower. Certain situations may be amenable to this type of access, but it certainly is not justifiable in all cases from a cost, safety or environmental point of view. We request that the Forest Service consider less restrictive alternatives than this on isolated or roadless areas of the Forest.

One well has recently been drilled on the North Fork utilizing helicopter mobilization. This singular activity, however can by no means be used to justify an across the board stipulation in all roadless areas. This particular well was drilled with the only rig in North American capable of being transported to location by airlift. Not only rig availability, but geology, altitude, terrain, location, economics and safety concerns are all of vital importance in determining the feasibility of this stipulation. We challenge the Forest Service to demonstrate that is a reasonable stipulation. 5

High Hazard to Soil and Water Complex

The entire Forest has 934,990 acres theoretically available for oil and gas leasing. The Preferred Alternative prescribes a "no surface occupancy" stipulation for areas of high hazard to the soil/water complex on about 549,000 acres. This stipulation alone reduces the available acreage to 385,990 acres. When one considers that there are numerous other year-round "nso's", seasonal restrictions, and access requirements (Appendix K), the probability of a company being able to develop a lease on the Shoshone is marginal at best. The summary states that the "rights of (mineral) lessees will not be abrogated, but full use of discretionary authority will be exercised in providing recommendations to BLM," p. 63. Our analysis of the Draft Plan/EIS makes us question the validity of this contention. If not abrogated, the value of a lessee's rights are certainly questionable under this Plan. 6

Appendix K discusses what surface resource stipulations may apply in areas of "high amenity values" or "high soil and water hazard potential". While the discussion does state that these items are intended to portray some of the conditions that can be applied to an operating plan, we must emphasize that these stipulations are not appropriate, feasible or necessary in all cases and should not automatically apply. The need for each stipulation including submergible pumps, electronic monitoring, buried pipelines, central collection, storage and treatment facilities, and non-motorized access must all be fully documented and justified by the Forest Service.

The implications of the preferred alternative and the Plan's general bias against oil and gas activity are deliberate steps to manage the Shoshone National Forest in a manner which discourages or eliminates opportunities for

99-5 See response to comment 68-6.

99-6 See response to comment 68-5.

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oil and gas development. The Forest Service has not fulfilled its obligation to present a Plan which provides reasonable access to energy resources. Instead the Plan is an over-reaction to local "polarization" over a recently drilled wildcat well and represents a disproportionate reliance on the concerns of local factions opposed to any oil and gas activity. The Plan must be revised to properly incorporate development of oil and gas resources as a statutorily authorized use of forest lands.

The Wyoming Wilderness Act of 1984 enacted nearly a year ago, released Forest Service lands that had been considered for wilderness status to multiple use and also prohibited the creation of restrictive buffer zones around existing wilderness areas. With wilderness decisions behind us it is now essential that lands outside of wilderness be managed as directed. This is particularly relevant to the Shoshone National Forest since five separate areas are designated as wilderness encompassing 1,379,048 acres. The Plan should, but does not, endeavor to manage the Forest's remaining acreage in a manner consistent with our nation's economic and energy security. 6

We do not believe that the Plan is "sufficient for industry to discover whether producible quantities of oil and gas exist under the Forest....", p. 64. To the contrary, the Draft Plan/EIS will severely limit mineral development opportunities on the Shoshone National Forest. The plan does this by eliminating leasing opportunities, imposing severe surface occupancy and access restrictions and requiring stipulations which may render operations economically infeasible. The totally biased treatment of minerals and excessive restrictions will result in lost opportunity to discover oil and gas reserves. Frankly, this Plan has the appearance of being an initial step toward defacto expansion of national park boundaries or an administrative attempt to create a Yellowstone Ecosystem management area.

Thank you for the opportunity to comment.

Sincerely,

Wendy H. Frueauf

cc: Senator Malcolm Wallop
Senator Alan Simpson
Representative Dick Cheney
Jim Torrence
D. Thomas Kidd
Bob Byron
Alice Frell

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Proj. No. Orig Type Appl

TRUE OIL COMPANY

RIVER CROSS ROAD

CASPER, WYOMING
P.O. DRAWER 2360
PHONE 237-9301
82602

September 30, 1985

Mr. Stephen P. Mealey
Forest Supervisor
Shoshone National Forest
P.O. Box 2140
Cody, Wyoming 82414

Dear Mr. Mealey,

The following are our comments for True Oil Company and the Independent Petroleum Association of America, concerning the Shoshone National Forest Draft Land and Resource Management Plan and Environmental Impact Statement.

True Oil Company is a Casper, Wyoming, based exploration and production company.

Independent Petroleum Association of America is a nationwide association of over 11,000 independent oil & gas people, of which approximately 250 reside in Wyoming. It should be mentioned that approximately 3500 of the members of IPAA operate in the state of Wyoming.

It is obvious from the first look at these documents that the oil & gas industry and their activities have had practically no consideration -- otherwise, why is the same amount of acreage available under each alternative? 1

Under your Preferred Alternative, a total lease value of $80.3 million is estimated for the ten year period. This dollar figure is $45.7 million less in lease value than if the current Management Alternative were continued. Your Preferred Alternative is also $49.7 million less than the RPA Alternative and a $56.7 million reduction from the Commodity Alternative. A comparison of these figures is an apt demonstration that the Plan's Preferred Alternative will reduce tremendously the value of lands within the Shoshone National Forest for oil and gas activities. Even worse is the lost opportunity to explore for and produce oil and gas in this very important area. Additionally all of the revenues, which go along with oil and gas productions, such as windfall profit tax, royalties, severance tax, ad valorem tax, the reduction in the balance of trade and having domestic oil and gas to furnish national security, would be a tremendous added benefit. It seems to me that these benefits far outweigh the other resource values which you have given remarkably heavy weight in your documents. 2

You state in your document that there is a total of 934,980 acres available for oil and gas leasing, but you neglect to reduce this figure by the number of acres which have "no surface occupancy" stipulations on them. Why aren't you honest in your document? An oil and gas lease or any other sort of lease has no value at all if you cannot occupy the surface! It seems strange that in your document all other commodities and uses in your draft plan, are increased but oil and gas activities are reduced beyond comprehension. 3

100-1 See response to comment 68-5.

100-2 Our analysis of oil and gas as a valued resource was accomplished using a procedure that had the support in the oil and gas industry (See Appendix D, EIS, Oil and Gas Valuation). The level at which benefits can be considered is fixed for all resources and should be at least comparable. The reduction in value of Shoshone National Forest for oil and gas production in the preferred alternative as compared to the commodity emphasis alternative represents the degree to which oil and gas activities are incompatible with other Forest uses. The Forest Service recognizes the importance of oil and gas production to the economy and national security. These factors have been considered, to the extent possible, along with other mandates directing how the Forest is managed.

The uses of the Forest other than preservation and nonmotorized recreation, such as wood fiber production, domestic livestock production, oil and gas development, developed recreation, and motorized recreation, have been provided for to the extent possible given a stewardship objective. The Forest Service feels that these more commodity-oriented uses have been provided for in balance with the noncommodity uses in the preferred alternative.

100-3 Note that much of the NSO land may have inclusions which may be available for surface occupancy after a site-specific analysis is done according to Appendix K of the Plan. The intent is not to deny the opportunity for oil and gas exploration and development but rather to provide opportunities while protecting other resources of concern to other forest users. See also response to comment 68-6.

FPD-100-W-L-B
Proj. No. Orig Type Appl

Your paragraph on pages 1 through 16, concerning Issues, Concerns, and Opportunities addressed during the planning process, polarizes even more any industry activities vs. local entities. The NEPA process is not a referendum, yet your documents rely heavily on local input of special interest groups. You should evaluate these areas and include in your document only facts, not emotions. It is obvious that you have not complied with the IBLA decision to consider the less restrictive alternatives prior to decisions of imposing severely restrictive stipulations on oil and gas leases -- please see BLM Instruction Memorandum 84-415. 4

Arbitrary, capricious, and restrictive management is apparent throughout the Plan, but the withdrawal of grizzly bear Situation I Habitat and the requirement to use airlift or nonmotorized access for isolated tracts, are absolutely mindboggling and overly restrictive. -- Please see Section 204 or FLPMA, 43 U.S.C. 1714, as interpreted in Mountain States Legal Foundation v. Andrus, 499 F. Supp. 380 (D.C. Wyo. 1980). 5

In the Routt appeal, RMOGA contended that the Plan's use of certain criteria (in that case steep slopes, visual quality objectives, etc.) to effect a programmatic removal of lands from mineral leasing constituted a withdrawal within the meaning of FLPMA and therefore, was subject to the reporting requirements of Section 204. In his decision on the RMOGA appeal, the Chief avoided the question of whether or not such a programmatic removal of lands from mineral leasing would be a withdrawal under FLPMA because he concluded that the plan was inaccurate in its use of the phrase "no lease". According to the Chief, the plan really meant to say that certain conditions existed in certain areas where operational damages on surface resources would be irreversible and irretrievable, and that such conditions may lead to decisions not to lease but those decisions would be made later on a site-specific basis. The Chief then remanded the plan with instructions to use a more accurate term than "no lease". 6

On the Shoshone Plan, we would make the same allegation as we did on the Routt Plan. The Forest Service has pre-judged that certain conditions (in this case, grizzly bear habitat) are incompatible with oil and gas leasing and based on that judgment, they have proceeded to withdraw some 66,000 acres. That clearly is a withdrawal under FLPMA and the Forest Service should proceed with the reporting requirements of Sect.204. If a withdrawal is not indended, please clarify the final Plan.

The requirement of using helicopters or nonmotorized transportation, is absolutely ridiculous and would in most cases prevent oil and gas exploration in the Shoshone National Forest. The oil and gas industry has demonstrated beyond the shadow of a doubt, that they are capable of operating in an extremely sensitive environment, without permanent degredation of the are. 7

The Forest Service must abide by IBLA decisions concerning mineral leasing. With you recommending such stringent requirements with no justification, puts the Bureau of Land Management in an untenable position -- whether to go along with the Forest Service on their stipulation recommendations or its obligations under the Mineral Leasing Act. Because of this, you are strongly urged to document all of your suggested stipulations, so that you can defend these stipulations to the BLM and the BLM can defend them before the IBLA. 8

100-4 While it is true that the NEPA process is not a referendum, we are not going to attempt to categorize public input into areas of fact or emotion. The Forest Service role is to recommend stipulations and operating procedures to the Bureau of Land Management that provide the minimum protection and restriction required to protect the surface resources and meet the management intent of the alternative selected. See also response to comment 68-1.

100-5 See response to comments 68-6 and 68-8.

100-6 See response to comment 68-8.

100-7 If, after a site-specific analysis, the area is truly isolated, then by present technology standards, helicopters are the only way to go. If access can be accomplished on the ground without violating soil and water standards, then this isolation criteria is no longer applicable. See also response to comment 68-6.

100-8 We agree that the reasons for recommending stipulation and operating procedures to the Bureau of Land Management should be documented. The NEPA process outlined in Appendix K of the Plan will be the method to accomplish this.

Comment 100

Forest Service Response

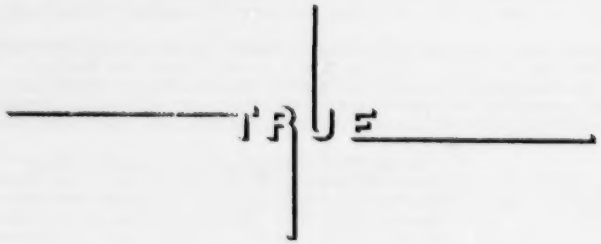
FPD: 100 W - L - B
Proj. No. [illegible]

You are strongly urged to go back to your draft plan and make it reasonable and realistic as stipulated by FLPMA and the IBLA decisions.

Sincerely,

Robert O. Byron
Chairman IPAA, Public Lands Committee
Administrative Assistant to H. A. True, Jr.

ROB/gp



Wyoming State Legislature

213 Capitol Building / Cheyenne, Wyoming 82002 / Telephone 307/777-7881

RECEIVED OCT 2 1985

FPD-101-W-L-G
Proj. No. Appl

REPRESENTATIVE BARBARA DOSOS
Natrona County
1112 Bonnie Brae
Casper, Wyoming 82601
Committees:
Revenue
Commerce and Business

30 September 1985

Stephen P. Mealey, Supervisor
Shoshone National Forest
P.O. Box 2140
Cody, WY 82414

Dear Mr. Mealey,

I am writing you to comment on the Shoshone National Forest Plan. Several elements of the plan are disturbing to me. My concerns are as follows.

In general, I sense a failure in the plan to address the cumulative impacts of the various activities you allow on the Forest on the ecosystem of the region the Shoshone is in. The significance of the Shoshone as wildlife habitat, particularly for big game and Grizzly Bears, is high enough that the Forest should be managed for wildlife as its primary resource, with the health of the entire ecosystem of first concern. The assumption which underlies the conclusions and recommendations of the plan--that wildlife and recreation are enhanced by timber harvest and road construction--is one of the purest fallacies the Forest Service has ever perpetrated on the public, and there have been many of those. 1 2

I think you have vastly overestimated the timber harvest you can allow without mining trees and adversely affecting the health of the Forest. Too many roadless acres are included for timbering, and far too many miles of new roads are included. I recommend no timbering in any areas of the Shoshone which are currently roadless. 3 4 5

This particularly should never be any timbering or any other exploitative activities in any area used by Grizzly Bears, whether it is designated as critical habitat or not. 6

I am concerned over your proposals to allow timbering north of Sinks Canyon in Dunoir Valley, in the area from Fiddler's Lake to Christina Lake, and in areas adjacent to current wilderness areas and Yellowstone National Park. I hope you will revise the plan to eliminate timbering in these areas. 7

There are some encouraging things in the plan. I appreciate your recommendation to manage the Clark's Fork so that it might remain eligible for wild and scenic status. If the legislature and our congressional delegation ever come to their senses and get over the wilder aspects of their water development hysteria, the Clark's Fork will have an excellent chance to be so designated. Your recommendation is a good one. 8

101-1 See response to comment 24-1.

101-2 See response to comments 90-1 and 182-5.

101-3 See response to comments 59-43 and 8-3.

101-4 In response to numerous concerns, the number of acres managed for timber harvest and the resultant amount of roads has been reduced in the final Plan. In the next fifty years, the Plan projects only eighty miles of new road which will be open to the public. There is projected 120 miles of existing road which will be improved and remain open to the public. An additional 150 miles of new road, and 255 miles of reconstructed existing roads are projected to be closed to the public within the 50 year period. Road construction and reconstruction figures have been corrected. See also response to comments 182-5, 33-9, 80-5, and 44-46.

101-5 In the 1984 Wyoming Wilderness Act, Congress directed that nonselected roadless areas be released for multiple use purposes, and that "buffer areas" were not to be considered adjacent to Wilderness. With this legal direction in mind, some timber sales and the accompanying roads have been scheduled in roadless areas, while other currently roadless areas have not been scheduled. See also response to comments 182-5 and 44-46.

101-6 It is recognized that disturbance activities such as timber sales can displace grizzly bears and potentially increase the risk of bear mortalities. Mitigation measures such as provisions for adjacent security areas and stringent controls on timing and administration of activities will be incorporated as necessary in timber sales. As indicated, logging can improve the quality and quantity of bear foods.

101-7 See response to comment 101-5

101-8 The Proposed Plan incorrectly states that we can apply for an extension of the protection period for the River. It is contingent upon an act of Congress to protect the River either by including it in the Wild and Scenic River System or by providing additional temporary protection. It is uncertain at this point whether the Clarks Fork of the Yellowstone River will become a part of the National Wild and Scenic Rivers system. The Forest Service and the Administration are in favor of the River's inclusion. Management activities that are within the discretion of the Forest Service will be designed to maintain the River's eligibility. Other activities that are presently within the discretion of agencies such as BLM (minerals) or Federal Energy Regulatory Commission (hydropower development) could affect eligibility characteristics of the Clarks Fork. In the event such developments are proposed, we would recommend denial to the appropriate agency, until Congress acts. See also response to comment 97-1a.

Comment 101

FPD-101-W-L-S
Proj. No. Orig Type Appl

I also wholeheartedly support your recommendation to remove all wilderness and critical Grizzly Bear habitat from oil and gas leasing and development. That industry has enough of the Shoshone and other public lands to do as they please with, without disturbing these areas. I hope you will stand fast in this recommendation in the face of the severe political and bureaucratic pressure which will be brought to bear on you to change this. 9

I appreciate the opportunity to comment on the Shoshone National Forest Plan. You have a difficult task in sorting all this out. Good luck and best wishes in your efforts.

Sincerely,

Barbara M. Dobos

Rep. Barbara M. Dobos
Natrona County

Forest Service Response

101-9 The decision to recommend lease denial in Situation I is supported by two environmental analysis documents. In both cases, there were no public comments on these documents which opposed this decision. These documents are the DEIS for Oil and Gas Exploration and Leasing within the Washakie Wilderness and the 1982 Environmental Assessment of Oil and Gas Operations in Grizzly Bear Situation I and II. Further, the decision was supported by the U.S. Fish and Wildlife Service in their formal opinions written for these documents. The U.S. Fish and Wildlife Service recently issued a "no jeopardy opinion" on the Forest Plan. This opinion was partially based on lease denial on Situation I lands.

The decision in the Plan does not constitute a withdrawal for it is a temporary ban on leasing. If Situation I lands were withdrawn, leasing following recovery of the bear would require negation of the withdrawal.

The Plan selected the option of requiring no-lease as opposed to withdrawal because in the event of a recovered grizzly bear population, leasing would again be considered. Further, the cumulative effects studies currently underway might help us understand ways in which oil and gas activities may be accomplished with no effect on the Grizzly. Once the cumulative effects can be predicted, then the Interagency Coordinator Committee could consider the general opening of Grizzly Situations I to leasing and formally consult with U.S. Fish and Wildlife Service.

There are many other resource restrictions in Grizzly Bear Situation I habitat. Timber operations as well as recreational opportunities are limited in these areas.

RECEIVED OCT 2 1985

FPD-102-W-L-B
Casper Division Orig Type Appl
Production United States

Marathon Oil Company

P.O. Box 120
Casper, Wyoming 82602
Telephone 307/235-2511

October 1, 1985

Mr. Stephen P. Mealey
Forest Supervisor
Shoshone National Forest
P. O. Box 2140
Cody, WY 82414

Re: Shoshone National Forest
Land Resource Management Plan
(the "Plan").

Dear Mr. Mealey:

The Plan is one of the best I've seen come out of the Forest Service planning process from the technical presentation point of view. The display and analysis used in the plan are state of the art. The use of Appendix J as a general indication of what to expect for resource allocation is an innovative step in informing the public of what to expect.

On the other hand, it appears that the plan and allocations associated with them are biased against oil and gas activities. To begin with, the issues and concerns identified under "Issues, Concerns, and Opportunities" address a polarization and allude to the fact that some local entities are opposed to oil and gas exploration. This, along with the social impact analysis, does not weigh concerns with the number of people affected. The NEPA process is not a voting issue, yet these documents rely heavily on special interest groups sentiment. 1

The plan incorporates an "Oil and Gas Valuation Procedure" (Appendix D) which is similar to the B.L.M. Fluid Minerals Leasing Guidelines and the RMOGA matrix system of mineral potential evaluation. It is not apparent from the plan that Appendix D is utilized in making trade-offs of resource allocation; instead, it appears that minerals were an afterthought added as an appendix. The Preferred Alternative has an estimated lease value of $80.3 million. This is a 36% decrease from the current management Alternative, a 38% reduction from the RPA Alternative, a 41% reduction in the commodity Alternative, and a 22% decrease from the Reduced Budget Alternative, yet there is only a 19.8% increase from the NON-Commodity Alternative. This is not justified. There is no balancing of resource allocations. With only 18% of the entire Forest practicably open for oil and gas exploration 2

102-1 The various alternatives were developed through a scoping process that included consultation with a variety of groups, including those affiliated with the oil and gas industry. (See pages VI-1 to VI-6 ofthe chapter). The alternatives were evaluated through a social impact assessment that again included a variety of concerns, including oil and gas. Alternative D, which restrains oil and gas activities to a degree, was most acceptable in terms of resolving social conflicts (See Appendix F of the EIS). It was also among the most acceptable in terms of environmental effects (See Chapter IV of the EIS). In addition, our internal analysis of oil and gas as a valued resource was accomplished using a procedure that had the full support of our correspondents in the oil and gas industry (see Appendix D, EIS, Oil and Gas Valuation). Use of this procedure and how it was going to be displayed as well as a preview of the draft documents were done with regional representatives of this group. Input from this group was relied on as much as any other local, regional or national group.

The NEPA process does not try to determine which comments were more important than others, or determine which issues were emotional and which were fact. It simply takes the issues and develops a series of alternatives to include the issues raised in the EIS process. It is not a voting process. There is considerable polarization because of the many uses and many users of the Forest. Appendix F of the EIS has dealt with the social impact analysis with the framework of the alternatives generated by the scoping process.

102-2 See response to comment 68-5.

Comment 102

Forest Service Response

FPD-102-W-L-B
Proj. No. Orig. Tran. Data

Mr. Stephen P. Mealey
Shoshone National Forest
Cody, WY
Page 2

(i.e., no NSO stipulations), the opportunity for oil and gas exploration is foregone for other resources or uses which will not substantially aid in revenues for the Forest or the Nation. The Plan should give more consideration to the exploration for and the development of these potentially valuable mineral resources. 2

There is no indication in the Plan as to where travel corridors occur or where roads will be allowed in the Forest. The Travel Management discussion addresses, in graph form (Figure III-4), the percent of closure of Forest Roads, but does not indicate where they occur or are planned. This is especially important in light of the Plan's direction for "isolated tracts" where oil and gas leases occur. The documents are permeated with the idea that helicopter mobilization is the answer to access to "isolated tracts" away from current or planned roads. This is ill-conceived. 3

102-3 See response to comment 68-6.

In some instances helicopter mobilization, although an alternative, is not feasible because of altitude, cost, safety, and other concerns. Other circumstances to consider are the availability of helicopters capable of moving drilling operations, availability of drilling rigs which are helicopter portable, and the overall economics of helicopter mobilization. Although helicopter mobilization was utilized in the Shoshone National Forest in one instance for an exploratory well and on an experimental basis (only the second time in the Rocky Mountains), it is being proposed as the "cure-all" for oil and gas exploration. This is a hasty conclusion and should not dictate conditions on future exploratory operations. Further, at the present, it seems infeasible to have production via helicopter mobilization. 4

102-4 If, after a site-specific analysis, the area is truly isolated, then by present technology standards, helicopters are the only way to go. If access can be accomplished on the ground without violating soil and water standards, then this isolation criteria is no longer applicable. See also response to comment 68-6.

The Multiple Use Sustained Yield Act ("Multiple Use Act") states that "...nothing herein shall be construed as to affect the use or administration of the mineral resources of National Forest Land...", yet the entire plan demonstrates a bias against mineral resources in favor of other resources. Additionally, the current lease application/recommendation process on the Forest is in direct conflict with the Multiple Use Act and the Energy Security Act. There are currently 140 lease applications/recommendations pending, some of which are 10 years old. The plan suggests that 30 days will be needed to process these leases, yet this seems unrealistic given the current situation and staff availability. What steps have been taken for the reporting requirements of Section 204 of Federal Land Policy Management Act? If none have been taken, it appears to be an unlawful de facto withdrawal. Marathon suggests that steps must be taken in accordance with Federal law. 5

102-5 See response to comment 68-5.

FPD 102- W. 4 B.
Proj. No. Corr. Ltr. Instr.

Mr. Stephen P. Mealey
Shoshone National Forest
Cody, Wyoming
Page 3

A similar delay situation can be expected to arise if the estimated 10 to 20 Applications for Permit to Drill (APD's) per year are submitted. In light of current and expected funding, how will these backlogs be handled to expedite mineral applications? (i.e., leases or APD's) We believe the Plan should address this significant processing delay and suggest workable alternative solutions.

7

102-7 Appendix K of the Plan outlines a process for dealing with oil and gas leases and APD proposals. This process is now being used to decrease the backlog of pending leases as well as dealing with new leasing proposals. Developing lease recommendations to forward to the BLM may require a very short Environment Assessment or an EIS depending on the area and issues raised.

The major conflict in the planning document arises from the withdrawal of Grizzly Bear Situation I Habitats. First, there is no mechanism for withdrawal of these lands under FLPMA. The lands have not been recommended for withdrawal under Section 204 and, apparently, there is no intention to do this. Secondly, the Forest Service is substituting its belief that oil and gas leasing will be detrimental to the grizzly bear without consulting the U.S. Fish and Wildlife Service as required by Section 7 of the Endangered Species Act ("ESA"). In activities regarding leasing, such as the 1979 leasing E.A., the U.S. Fish and Wildlife Service has not issued a jeopardy decision for the proposed action. Even in instances where drilling has occurred, the U.S. Fish and Wildlife Service has deferred total approval, opting for an incremental decision making process. There has been no opportunity to mitigate possible impacts to grizzly bears in Situation I Habitat; the opportunity has been completely forgone for oil and gas. If a withdrawal of land for oil and gas leasing is intended, the Plan should so state and action must be taken to comply with the ESA.

6

102-6 The decision to recommend lease denial in Situation I is supported by two environmental analysis documents. In both cases, there were no public comments on these documents which opposed this decision. These documents are the DEIS for Oil and Gas Exploration and Leasing within the Washakie Wilderness and the 1982 Environmental Assessment of Oil and Gas Operations in Grizzly Bear Situation I and II. Further, the decision was supported by the U.S. Fish and Wildlife Service in their formal opinions written for these documents. The U.S. Fish and Wildlife Service recently issued a "no jeopardy opinion" on the Forest Plan. This opinion was partially based on lease denial on Situation I lands.

The decision in the Plan does not constitute a withdrawal for it is a temporary ban on leasing. If Situation I lands were withdrawn, leasing following recovery of the bear would require negation of the withdrawal.

The Plan selected the option of requiring no-lease as opposed to withdrawal because in the event of a recovered grizzly bear population, leasing would again be considered. Further, the cumulative effects studies currently underway might help us understand ways in which oil and gas activities may be accomplished with no effect on the Grizzly. Once the cumulative effects can be predicted, then the Interagency Coordinator Committee could consider the general opening of Grizzly Situations I to leasing and formally consult with U.S. Fish and Wildlife Service.

There are many other resource restrictions in Grizzly Bear Situation I habitat. Timber operations as well as recreational opportunities are limited in these areas.

Thank you for considering these comments in your revision of the Plan and for the opportunity to submit them.

Sincerely,

Bradley G. Penn
Land/Environmental Coordinator

BGP:mg

85-M-079

Comment 103

RECEIVED [illegible] 2 1995

FPD-103-F-L-C
Proj. No. Orig Type Affil

Steve Mealey
U.S. Forest Service Supervisor
Shoshone National Forest
P.O. Box 8140
Cody, Wy 82414

Sept 27
Wayne Lewis
Box 243
Dubois Wyo
82513

Dear Mr Mealey

Some environmental groups have sent letters to people telling them things that are not the truth about your 50 year plan. I also read a peice in the pronghorn, that the Dubois locals said they dont need the saw Mill, pointing out how important recreation, tourism and Wildlife are to the local economy.

If these are the kind of lies the working people are trying to combat, do we really have a chance?

Ranchers, Wildlife managers, or observant hunter knows the clear-cut is soon supporting a lush ground-cover for wildlife and livestock use.

It is also know that the forest old pine needle need to be removed down to the mineral soil in order for plant seeds, particularly the pine nuts, to germinate and develop This

VI-318

Forest Service Response

Thank you for your comment.

Comment 103

Forest Service Response

FPD-103-F-L-C
Proj. No. Reg. Type Affil.

Because of the increased Pressure, from enviromental group, I dont think the forest service is able to harvest our timber and take care of our forests the way they should.

Lets keep people working and take care of our forest.

Sincerely Yours
Wayne Lewis

1 103-1 The Forest Plan has established standards and guidelines for resource management. These are based on scientific knowledge, and are sound management practices. The Forest Service, as a public agency also is sensitive to the expressed opinion of all segments of the population and not just to environmental groups.

2 103-2 Timber Harvest levels in the Forest Plan have been established according to economic viability, and timber type and condition. Harvest levels in the final Plan remain approximately the same as in the proposed Plan, and are slightly higher than levels of the last ten years.

Comment 104

Forest Service Response

FPD-104- F- L- C
Proj. No. Orig Type Aid

RECEIVED [illegible] 2 [illegible]

Steve Mealey
U.S. forest Service Supervisor
Shoshone National forest
P.O. Box 2140
Cody, Wy 82414

Sept 27
Linda Lewis
Box 243
Dubois Wyo
82513

Dear Mr Mealey

I am so tired of hearing the lies and stories about the timber industry, I am also tired of having to fight to keep my job, stay where I love it, own my home, have a child in school. Why do we have to?

Managed right the forest has to be burned or clear-cut to maintain a lodgepole pine forest. Why not harvest and keep people working instead of on welfair?

Clear-cutting is soon supporting a lush ground cover of a mixture of grass, forbs, shurbs, and etc. Which will in a few short years be thickly interspersed with a new growth of small trees recreating the forest.

Clear-cutting does in fact increase the run off. The main reason for the

1 104-1 Timber Harvest levels in the Forest Plan have been established according to economic viability, and timber type and condition. Harvest levels in the final Plan remain approximately the same as in the proposed Plan, and are slightly higher than levels of the last ten years.

pages tightly bound

FPD 104 F L C
Proj. No. [illegible]

that falls on the tree branches evaporates and provides no run-off which the areas without trees allow the snow accumulate on the ground where it later melts and runs off.

Lets take care of our forests and keep people working at the same time.

Sincerely Yours
Linda Lewis

Comment 105

Forest Service Response

RECEIVED OCT 2 1985

FPD-105-F-L-C
Proj. No. Orig Type Affil

U. S. Forest Service Sup
Shoshone National Forest
P.O. Box 2140
Cody, Wyo 82414

Dear Mr. Steve Mealey.

I am writing this letter to let you know how I feel about the 50 year Shoshone National Plan. I am for logging as it means work and a livelihood. I am employed by the Upper Wind River Energy Council. I know this means nothing to you for I am the only employee. My job supplies 60% of the fire wood for the town of Dubois. I have delivered wood free of charge to wives who are widowes. I also have Senior Citizens who get top priority. I also have people from Riverton, Garden, Casper, Wind River Canyon and Thermopolis who have enquired and sold wood to. I feel if my job was to end it would put a lot of pressure back on the Forest Service with people up there not knowing what they are doing. Saying you have trees in middle of roads, High Stumps, Saw cuts people getting hurt and so on and on.

My truck is 14' long. 7½ high and 7½ ft wide. It is a nice load of

1

105-1 Economic impact analysis of a Forest Plan and its alternatives has been done to see how management of that Forest will effect local economic and social systems. In this analysis, it was found that we have an effect on local economies through our management of timber. For this reason, the preferred alternative attempts to maintain harvest levels at historic levels. In that part of the Forest effecting the Dubois-Riverton timber industries, the allowable sale quantity of timber is at or slightly above the average amount of timber sold in that market from the Shoshone in over the last 15 years (average annual in the plan is slightly above 5 MMBF for the Wind River District in the Plan while over the period from 1971 to 1985 average annual from the same District has been about 4.5 MMBF).

From this analysis and from the fact that mills in this area require 24 MMBF to 26 MMBF per year to remain viable, it appeared that timber from the Shoshone was not a determining factor in supporting this industry. The same is true of the Forest's influence on the rail lines. In fact, given that the Plan proposes about the same level as offered over the last 15 years, the change caused by the Plan was deemed insignificant.

The Shoshone has met with planners from the Bridger-Teton and economists from Region 4 on this issue including a meeting in Dubois. The Bridger-Teton will publish a draft with a preferred alternative which indicates their intentions regarding timber to be offered to this market. At the time their analysis is complete, there will be an analysis of joint effects.

Comment 105

I feel very strong about the Big Company here for a fast buck is a Bunch of Bull." Louisiana Pacific does not charge one dime. It is all donated, every last bit. I am treated by every one down at L.P. as if I was one of them. This is one more of the ways that they (L.P.) puts back into the community.

Employed by
Upper Wind River Energy Coun
Mrs (Bernie Ruff)
Box 463
Dubois Wyo.

82513

RECEIVED
SHOSHONE NATIONAL FOREST
OCT 2 11 15 AM '85
U.S. FOREST SERVICE
CODY, WYOMING

Comment 106

Forest Service Response

Milton Stewart
P.O. Box 1
Dubois, Wyo 82513

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FPD - 106 - F - L - C
Proj. No. Orig Type Affil

Mr. Stephen P Mealy, Supervisor
Shoshone National Forest
P O Box 2140
Cody, Wyo 82414

VI-324

Sir:

The fifty year plan for the Shoshone National Forest is a farce. The forest is already more than 50% wilderness. The Wilderness act of 1984, as I understand and as our congressional delegation tries to make us believe, was supposed to reduce the land not put into Wilderness for multiple use. Your plan for the Shoshone National Forest is contradictory to the Wilderness Act of 1984.

Timber is a renewable resource. It provides some of the necessities required for man to survive. Heat and shelter. The plan to harvest timber on only 5% of the forest has a very odorous aroma to it. Maybe like rotten, stinking, politics?

The Greater Yellowstone Coalition needs more land for the grizzly. Of course a use for the grizzly has never been found except to give some screwballs something to shout about. The problems with the grizzly started when the garbage dumps in Yellowstone were closed. The bears just naturally went to the nearest garbage, now they want to make the yard larger. What a terrible waste of resources and ~~man~~ man power, and only to maintain a public nuisance. No one but a very sick person would force grizzlies on to their fellow man.

1

2

106-1 Forty-five percent of the Forest could be considered as having a conifer cover type. Of this, only a portion is suitable for being considered for wood fiber production. Site quality, watershed protection needs, wilderness designation, recreation demands, economic conditions, access limitations, and other factors reduce the land available for wood fiber production to between three and six percent of the Forest.

The Forest Service is directed to manage for many uses including meeting demands for primitive forms of recreation and hunting. All lands are to be managed in a manner that can be sustained in the long term, in other words, managed with stewardship in mind. The Forest Service must also balance competing demands on Forest resources. The uses of the Forest other than preservation and normotorized recreation, such as wood fiber production, domestic livestock production, oil and gas development, developed recreation and motorized recreation, have been provided for to the extent possible. The Forest Service feels that these more commodity-oriented uses have been provided for in-balance with the noncommodity uses in the preferred alternative.

106-2 The Grizzly Bear is a species classified as threatened nationally (lower 48 states) in accordance with provision of the Endangered Species Act. It thus be managed according to provisions of this Act.

The only conclusion I can draw is that supporters of the Greater Yellowstone Coalition do not consider the rest of the population as this fellow man.

FPD - 106 - F - L - C

If the Wyoming Fish & Game is to be the only commercial user of the National Forest, why shouldn't they have to pay per animal unit the same as a rancher does? Better yet! Lets stop all hunting. That way the grizzly will have their garbage and the park will not have to be made larger. The Wy. Fish and Game could be disbanded thereby saving the taxpayers the retirement of countless bureaucrats. It would also save the sportsman the high cost of regimented sport.

2

The Wy. Fish & Game uses logging as an excuse for the decline in hunting permits, saying game cannot exist in logged areas. You as a forester should know this is not so. The Fish and Game does not take into account the increase in hunters. If, as they say, timbering has cut down the elk herd, why have they more than doubled the number of out of state permits during the same period. How is the increase in the number of outfitters justified?

3a

Of course the Fish & Game is not obligated to tell the truth, nor is the Forest Service. Neither are they bound by laws passed by the Federal Government. The Senate and the House of Representatives.

Why is the Forest Service willing to sell out a segment of the population that they should encouraged as an industry to help them manage the forest?

3

106-3a The Forest agrees that well-designed timber sales enhances habitat diversity and increases the carrying capacity capability for wildlife, especially elk. With the elk populations on the Shoshone at or near their winter habitat capacity, additional permits have been issued by the Wyoming Game and Fish Department to maintain the herds at stable population objectives. Also see response to comment 1-1.

106-3 Timber harvest levels in the Forest Plan have been established according to the economic and biologic factors of individual stands. With harvest at a level slightly higher than current, it is not felt that the Forest Service is "selling out".

Comment 106

EPA-106-E-L-C

Why if the environmentalists wish to appease [illegible] dictatorship on public lands, don't they buy these lands instead of conning representatives and senators into forcing me to support the public lands for their benefit.

Yours for better government

William Stewart

Oct. 1, 1985
Dubois, Wyo.

RECEIVED OCT 2 1985

STEVE MEALY
U.S. FOREST SUPERVISOR
SHOSHONE NATIONAL FOREST

FPD-107-E-1-C
Proj. No. Orig Type Appl

Dear Mr. Mealy,

I am a timber fallers wife from Dubois. My husband has cut timber in the Bridger-Teton and Shoshone forests for 12 years. We have never felt that we needed to "comment" on how the Forest Service was doing their job. We feel that they have managed it right.

This morning I finally got around to reading the Sept. 26 issue of the Dubois paper. (Since a young environmentalist had a little urging people to "comment" on a 1500 page 50 year plan by Oct 31st!

There are over 130 people who have timber related jobs here in Dubois. There are several hundred more whose livelihood depends on this mill staying in Dubois. The fact that this mill goes or stays will also determine whether the railroad stays or pulls out of Riverton.

I know that several hundred people here want the timber harvest to continue at current levels or even at INCREASED levels — and yet I would lay odds

1

VI-327

107-1 Timber Harvest levels in the Forest Plan have been established according to economic viability, and timber type and condition. Harvest levels in the final Plan remain approximately the same as in the proposed Plan, and are slightly higher than levels of the last ten years.

Economic impact analysis of a Forest Plan and its alternatives has been done to see how management of that Forest will effect local economic and social systems. In this analysis, it was found that we have an effect on local economies through our management of timber. For this reason, the preferred alternative attempts to maintain harvest levels at historic levels. In that part of the Forest effecting the Dubois-Riverton timber industries, the allowable sale quantity of timber is at or slightly above the average amount of timber sold in that market from the Shoshone in over the last 15 years (average annual in the plan is slightly above 5 MMBF for the Wind River District in the Plan while over the period from 1971 to 1985 average annual from the same District has been about 4.5 MMBF).

From this analysis and from the fact that mills in this area require 24 MMBF to 26 MMBF per year to remain viable, it appeared that timber from the Shoshone was not a determining factor in supporting this industry. The same is true of the Forest's influence on the rail lines. In fact, given that the Plan proposes about the same level as offered over the last 15 years, the change caused by the Plan was deemed insignificant.

The Shoshone has met with planners from the Bridger-Teton and economists from Region 4 on this issue including a meeting in Dubois. The Bridger-Teton will publish a draft with a preferred alternative which indicates their intentions regarding timber to be offered to this market. At the time their analysis is complete, there will be an analysis of joint effects.

that those several hundred people are just like me ..... they haven't got around to writing for one reason or another. Loggers, by and large, are just not the kind to write letters telling the Forest Service how to do their job. We are embarrassed by these vocal young Eastern environmentalists who are trying to run your business for you.

There is a "public" meeting scheduled this Wednesday night to discuss the future of the timber industry here. (a little late to encourage letter writing to comment on your 50 year plan) The mill sponsored a letter writing "meeting a few weeks ago and only one worker showed up. So you see how that - even though their jobs depend on it - these thick headed loggers just won't write letters. Don't these some other way to get their "comments" on the record?

I see a poll conducted by the Wyo. Heritage Society, based there in Cody, shows that 56% of those polled favored the continued rate of timber harvest that we cut at the present time. (And none of those polled worked in a timber related business.)

Timber cutters are saying (to each other) that if the timber harvest were increased in the Shoshone Forest, we

VI-328

1

Comment 107

wouldn't have to be 'over the hill' in Sublette county fighting with them over "their" timber. But have any of them written to you and told you they want INCREASED harvesting? I doubt it.

FPD-107-F-L-C
Proj. No. Assn.

How are we going to get these guys to stand up for their jobs and be counted on the side of multiple-use & increased timber harvesting.

I don't have to tell you the advantages of timbering — it looks to me like it would be to the good of the Forest if we cut 90% of it down so it could come back young and healthy. If I had a garden, field or orchard in as bad of shape as our Forests are in, in Wyoming I'd sure mow them under and start over with new.

This letter might not arrive in time to be counted as a "comment" on your 50 year plan — but please count me in somewhere as favoring continued multiple use and increased timber harvest.

Please "hang in there" and don't let the extremist environmentalist groups

influence you to lock up our Forests.

I know that there was a petition from here with 900 signatures on it, in support of logging in our Forests, that was sent to Congressman Cheney. I hope that you are aware of that petition. I have a feeling that if it's up to the congressman (who I know supports Wilderness) to tell you about it - you'll never hear about it.

I'm enclosing some editorials by Robert A. Peck who publishes the Riverton Ranger. I hope that through his efforts to encourage people to write, that you have received at least a few letters of support.

Sincerely yours
Vanessa Johnson

Vanessa Johnson
Box 39
Dubois Wyo. 82513

VI-330

1

Comment 108

Forest Service Response

RECEIVED OCT 2 1985

FPD-108-W-1-C
Proj. No. Orig Type Affil

Route 62, Box 164
25 E. Main Street
South Pass City, WY 82520
September 30, 1985

Stephen P. Mealey, Forest Supervisor
Shoshone National Forest
P.O. Box 2140
225 West Yellowstone Ave.
Cody, WY 82414

Dear Mr. Mealey:

I have several comments concerning the draft Shoshone National Forest Management Plan. First, this document overemphasizes timbering, especially in the present roadless areas. Even though all the proposed alternatives assume that an increase in timbering and the corresponding construction of roads will positively affect wildlife and recreation, the plan fails to offer any detailed evidence to support this contention. A few people argue that less-than-forty acre clearcuts will diversify the wildlife's summer habitat. Since Shoshone Forest already contains sufficient meadows, however, timbering will not benefit wildlife in this manner. Also, the proposal to build and reconstruct 13.3 miles of roads per year, mostly as a result of timbering, will destroy primitive and semi-primitive recreational experiences which many people enjoy. In fact, the plan indicates that the existing road system on the forest will fulfill the estimated demand for vehicular recreation for the next fifty years. 1

Therefore, timbering and road building appear to adversely affect wildlife and recreation, rather than complement them as the draft plan claims in all of its alternatives. As a result, I cannot endorse any of the alternatives. Instead, I urge the Forest Service to consider an alternative that increases recreational opportunities and wildlife habitat, decreases timber production, and maintains the existing level of roads. Since the plan correctly concludes that recreation is the highest economic use of the forest, such an alternative would yield the maximum economic and social benefits to the nation, state, and local communities. 2

I also recommend that the National Forest analyze the impacts of continued below-cost, or deficit, timber sales on the economic and social stability of the local communities. Since these sales depend upon continued federal subsidies, the Shoshone plan's proposal of cutting 11.1 million board feet per year will further exacerbate the instability of towns such as Dubois. In addition, the Forest Service should offer specific examples in which timbering and road construction benefit wildlife, recreation, and water yields, and then demonstrate that these benefits, if any, can not be accomplished in a more cost-effective manner. 3

Specifically, I recommend that no timbering or road construction occur in present roadless areas or in critical wildlife habitat. Timbering in other areas would allow the small, community lumber companies to exist, yet eliminate the large deficit sales to national corporations, such as Louisiana-Pacific. I also suggest that no timbering activities or new road construction occur from Fiddlers Lake to Christian Lake, along Sawmill Creek, around Worthen Meadows, and north of Sinks Canyon. Timbering would destroy these important recreational and/or wildlife areas. In addition, I urge the Forest Service to close the Christina Lake road and not permit roads to exceed an average of one mile per square mile of forest land.. 4 5

108-1 The uses of the Forest other than preservation and nonmotorized recreation, such as wood fiber production, domestic livestock production, oil and gas development, developed recreation, and motorized recreation, have been provided for to the extent possible given a stewardship objective. The Forest Service feels that these more commodity-oriented uses have been provided for in balance with the noncommodity uses in the preferred alternative.

108-2 See response to comments 44-43 and 182-5.

108-3 See response to comment 44-46.

108-4 Timber sales selected through the forest planning process have been selected to maximize present net value. Data is based on historic selling value and experienced costs. It is anticipated that future sales will not be "below cost" sales according to present knowledge of selling values and costs. Wildlife and recreation values have not been included in the calculations of PNV for the purposes of selecting sales for harvest.

108-5 In the 1984 Wyoming Wilderness Act, Congress directed that nonselected roadless areas be released for multiple use purposes, and that "buffer areas" were not to be considered adjacent to Wilderness. With this legal direction in mind, some timber sales and the accompanying roads have been scheduled in roadless areas, while other currently roadless areas have not been scheduled. See also response to comments 182-5 and 44-46.

2

FPD-108-W-L-C
Proj. No. Orig Type Appl

Second, the plan favors motorized recreation at the cost of the primitive and semi-primitive experiences. If the draft document is implemented, then the southern end of the forest will contain 96,910 acres for motorized recreation, 13,400 acres for semi-primitive recreation, and 160 acres for primitive, non-wilderness recreation. Obviously, proposed roads and timbering will virtually eliminate all the present roadless areas outside of the Pono Agie wilderness. 6

If the Forest Service decreases timbering and eliminates the building of new roads, then the proper balan may be restored. With this in mind, I recommend that the Forest Service designate the following areas as 3B:

- all of Ed Young Basin
- the Indian Ridge area
- the North Pono Agie River area
- from Fiddlers Lake to Christina Lake.

In general most of the existing primitive recreational opportunities outside of the Pono Agie Wilderness area should be labeled 3B. Since the Forest Service predicts a 4% increase in outdoor recreation per year, then the agency needs to devise a plan that prevents overuse of a specific area, such as Christina, Fiddlers, and Valentine Lakes. 7

Third, the plan's wildlife section is well-written, thoughtful, and fairly good. I commend the Forest Service for eliminating oil and gas leasing in Grizzly Bear Situation I habitat. I urge the agency to also forbid timbering in these areas and any development in all important wildlife habitat. The Forest Service should work with the Wyoming Game and Fish Department to increase grizzly bear and elk populations throughout the Shoshone. The Ed Young Basin and Indian Ridge areas should be managed primarily for wildlife. 9

Fourth, the plan's treatment of cultural resources is too brief. Since only one percent of the forest has already been surveyed for archeological and historical sites, it is fairly obvious that the Forest Service will not complete this inventory by 1990. As a result, I offer the following two recommendations. First, the Shoshone forest should employ a full-time historian or archeologist to identify significant cultural remains on the forest. Second, this person should also evaluate, preserve, and interpret these important sites for the public. Many historical sites exist on the southern end of the forest near South Pass. By coordinating activities with the Bureau of Land Management, which has created the South Pass Historic Mining Area, and with the Wyoming Recreation Commission, which administers the South Pass City State Historic Site, the Forest Service could help promote the recreational and historical opportunities in this region. In fact, a good historical interpretive program would increase the recreational use on the entire forest. Unfortunately, this aspect of recreation was not completely explored in the plan. 10

Finally, the plan's greatest weakness is its failure to devise an adequate monitoring system. If the Forest Service is unable to review and enforce stipulations in oil and gas leases and timber sales, then most of the plan's provisions on behalf of wildlife will be useless. In fact, I believe that an effective monitoring program is critical to the implementation of any forest plan which the Forest Service creates. It is imperative that a final draft contains a detailed monitoring system. 11

108-6 See response to comment 44-46.

108-7 In order to disperse recreation use and to emphasize high quality, low density recreation, the Plan has increased the amount of land managed for primitive and semiprimitive nonmotorized recreation when compared to current direction. Roads built exclusively for timber will be closed to the public in terms of motorized use and will provide access for nonmotorized users. Refer to Appendix A for timber harvests planned in the first decade and Appendix J for the chosen management strategy for the areas in question.

Overuse of areas occurs when they are the only areas which are accessible and recreation demand exceeds carrying capacity. Two major options are available to remedy such a situation: implement a permit system to limit use or provide access to other areas. The option chosen in the Plan is to provide better access in order to disperse use. This requires construction of roads in previously unroaded areas. Beyond this, the 4 areas mentioned are used for snowmobiling. This means that 2A is a more appropriate designation because 2A allows such use while 3B does not.

108-9 All projects proposed in occupied grizzly bear habitat will be evaluated to insure such actions do not jeopardize the continued existence of grizzly bear. Also see response to comment 14-5.

108-10 Cultural Resource evaluation and protection is emphasized (see General Direction, Plan page III-21). The program will include coordination with other federal and state agencies to assure that specific areas, such as the South Pass City area, are adequately protected. A full-time archaeologist now has responsibilities for National Forests in Wyoming. Each Forest has paraprofessionals responsible for cultural resource inventories. The Warm Springs Flume is an inventoried cultural resource site and it will be protected as such on both the Forest and neighboring lands administered by the BLM.

108-11 See response to comment 44-55.

Comment 108

FPD-108-W-L-C
Proj. No. Orig Type Attl

I commend the Forest Service for devising the draft management plan. It offers some positive proposals, such as protecting the integrity of the Clark's Fork river and eliminating oil and gas leasing in Situation I grizzly bear areas. I hope that my comments are incorporated into the final draft. Thank you for your time and consideration.

Sincerely,

Michael Massie

Michael Massie

Comment 109

RECEIVED OCT 2 1985

RECEIVED SHOSHONE NAT. FOREST OCT 2 11 19 AM '85 U.S. FOREST SERVICE CODY, WYOMING

EPD-109-0-L-C
Proj. No. Orig Type Affil

Clifford Boye
13 Chestnut St.
GlenCove N.Y. 11542
09-26-85

Dear Sir,

I would like to cast my vote for Alternative D for the proposed management plan of the Shoshone Nat'l Forest. It seems to me that Alt. D will be a well balanced plan for all activities and issues concerning this Nat'l Forest.

I'm glad to see that something positive will be done →

to protect the grizzly bear and wild bighorn sheep populations and every effort should be made to preserve and if possible, expand their habitat.

Also, I support wilderness designation of the High Lakes Study Area & the Dubois Area. I also believe that it is important that the government not subsidize any faultering industries within our Nat'l forests. Government money to support timber cutting should stop because it's a waste of taxpayer's money. Tongass Nat'l Forest in Alaska is known for this due to that wasteful & environmentally destructive provision of the Alaska Lands Act of 1980 that mandates taxpayers money to subsidize the timber industry there. It must be stopped

In conclusion, I would like to commend the persons involved in the Shoshone Nat'l Forest Planning Process for a job well done and thank you for the opportunity to comment on the plan.

Thanks,
Clifford Rose

PS. I support Nat'l Wild & Scenic River designation of the Clark's fork of the Yellowstone!

VI-335

1

Forest Service Response

109-1 Timber sales selected through the forest planning process have been selected to maximize present net value. Data is based on historic selling value and experienced costs. It is anticipated that future sales will not be "below cost" sales according to present knowledge of selling values and costs.

Comment 110

Forest Service Response

RECEIVED 2 1985

FPD-110-P-L-B
Proj. No. Orig Type Appl

Cody, Wyoming
October 1, 1985

Mr. Stephen Mealey, Forest Supervisor
Shoshone National Forest
P. O. Box 2140
Cody, Wyoming 82414

Dear Mr. Mealey:

We are writing in regard to the fifty-year plan for the Shoshone National Forest. The plan generally represents the multiple use concept but it seems weighted in favor of wildlife and recreation. We would like to see less emphasis on wildlife in some areas.

The areas of immediate concern to us are our forest grazing allotments which are critical to our ranching operation. Our allotments are Community and Bobcat.

The Bobcat Allotment: We would prefer that the Bobcat and Ishawooa Hills allotments be managed as two seperate units as they have been. The forage conditions in the Ishawooa Hills are in considerably worse shape than the Bobcat allotment so it needs to be managed much more intensively.

The proposed output for cattle forage for the first decade is listed as 98 AUM's for both the Ishawooa Hills and Bobcat allotments combined. We presently are permitted for 100 AUM's on Bobcat and believe Nancy Draper is permitted for about 360 AUM's on the Ishawooa Hills. We have historically had an increase in wildlife numbers along with the grazing. We feel the Bobcat allotment could support more cattle grazing with proper management as there is quite a bit of feed left in normal years. 1

The Community Allotment: The plan calls for 25 acres of aspen cutting per decade to benefit wildlife. To our knowledge there is very little aspen on the community range. 2

Planning for wildlife on the Southfork at the expense of domestic livestock and mineral exploration concerns us. When is there "enough" wildlife? We who raise livestock also raise hay for winter feed. Our hay fields help support a wildlife population much larger than the natural forest lands used to support. When the Siggins family homesteaded on the upper Southfork in 1914 they ate jackrabbits because deer, elk, and sheep were not there in the numbers of today. Part of the increase is due to management techniques but part must be due to increased forage on private lands. During the last month, about 60 head of elk per day are grazing in our hay fields on grass and alfalfa we badly need for our cattle. In the spring we support both deer and elk at a critical time when the alfalfa is starting to grow. From April 10 through the middle of June there has been an average of 180 head of deer and 40 3

110-1 The Bobcat and Ishawooa Hills allotments will continue to be a managed as two separate allotments when dealing and administering the range resources. We agree that the Ishawooa Hills allotment is a harsher site than the Bobcat allotment. No increases and/or decreases in livestock stocking and/or wildlife herd unit objectives will be implemented without new range analysis data and doing an environmental analysis.

110-2 The Forest Service will re-examine the availability of aspen cutting on the Community Allotment. Changes in management objectives for aspen management can be changed by amendment to the Forest Plan.

110-3 Prior to any reduction in stocking, range reanalysis will occur, the State Game and Fish will be asked to jointly ride the allotment with Forest Service and permittee, and numbers will be established based on discussion of parties involved.

Comment 110

FPD-110-P-L-B
Proj. No. Orig Type Arrl

elk in our hay land. The Game and Fish Department compensates us for some of the damage done on our irrigated hay land. This compensation does not take into consideration damage done to young alfalfa plants--many are finally killed by continual grazing of wildlife. Our hay crop is "set back" several weeks because the wildlife keeps it grazed down. We are not compensated for any forage consumed by wildlife on our private grazing land. The more the wildlife population increases the more pressure there is on private land. This source of feed allows the game population to increase past what the forest would support so more forest land is set aside for wildlife at the expense of domestic livestock. The cattleman works to improve the range he uses which also benefits wildlife. He pays for the forage used. 3

Our two forest allotments could support carefully supervised mineral activity. We do not want to see mineral exploration or production eliminated. There are hundreds of thousands of acres of wilderness land on which the public can recreate. Keep the forest lands multiple use.

The loss of oil companies in this area would cause great financial burdons for the rest of us in Park County. Alan serves on the Board of Directors of Shoshone River Power, Inc. The oil companies use 80% of the power sold by Shoshone River Power. Because of their continuously level load, they hold the rates down for the rest of us. If the present fields were depleted and the oil companies left the area the electric bills for consumers in the Southfork, Northfork, Sunlight-Cooke City, and Meeteetse areas would immediately triple. There would be an enormous increase in taxes and big payrolls would be lost to the community. People who make their living from their land cannot afford higher taxes and utility rates. 4

We are among the few on the upper part of the Southfork who have to make a living from the ranch and our herd of registered Polled Herefords. The cattle have paid most of the bills for a long time. We've worked years to improve our ranch and have worked with the Forest Service to improve the range allotments. We would like to see a real effort to control noxious weeds in the back country. They are a threat to both public and private lands. 5

Sincerely,

Alan L Siggins

Deanna L Siggins

Alan & Deanna Siggins
Southfork
217 Road 6 EH
Cody, Wyoming 82414

Forest Service Response

110-4 The General Mining Laws guide what can or cannot be withdrawn from mineral entry and under what conditions. We direct your attention specifically to Plan, Chapter III in the blue pages under Mining Law Compliance and Administration (General Direction 1C and 2) and Minerals Management Oil and Gas and Geothermal (General Direction 1). All direction found under Minerals Management, supplemented by Plan Appendix K, is intended to protect existing and proposed uses of the land for other resources thereby avoiding the need for withdrawal. If exceptional situations arise, or existing direction is shown to be insufficient, the option of withdrawal remains.

Mineral operations are by law, a viable use of public land. Our charter, provided by Congressional action, is to manage first according to law, and not strictly according to variable market pressures. The mining laws stipulate that lease applications can be made and must be considered for lands not withdrawn. The Forest Plan was selected in large part because it allows mineral activities while recognizing and maintaining the values of clean water, stable wildlife populations, and recreation opportunities which are of primary importance to many Forest users. The Forest Plan affords adequate protection of popular recreation areas, critical wildlife habitat, and other such resource values through application of stipulations and recommended operating procedures. Protection may be in the form of seasonal restrictions or no-surface-occupancy stipulations (see Appendix K of the Plan).

One consideration here is that a lease may never result in actual drilling activity; historically, a low percentage of leases are explored or developed, due in part to market fluctuations and uncertainties.

110-5 On the Community analysis area 135, sixty acres of noxious weed control is planned for the first decade.

RECEIVED Oct 2 1985

FPD-111-P-L-C
Proj. No. Orig Type Affil

SHARON KAHIN
SPRING RANCH
STAR ROUTE
DUBOIS, WYOMING 82513
TELEPHONE 307-455-2280

October 1, 1985

Stephen Mealey, Supervisor
Shoshone National Forest
P.O. Box 2140
Cody, Wyoming 82414

Dear Mr. Mealey,

I am writing concerning the proposed Shoshone National Forest plan. As a rancher I am extremely concerned about what I see as the plan's short-sighted goals - how can you possibly support increased timber harvesting at 10% above current levels when the timber industry is supported by the government? My understanding of your plan is that much of this proposed cutting is to be done in roadless areas. With the increasing demand for unspoiled areas for recreation this simply does not make sense. 1 2

Those of us in Dubois who are not hoodwinked by Bob Baker and the LP's rhetoric are perfectly aware that LP will pull out in the near future leaving behind acres of forest that are unsuitable for recreation. Why plan to keep alive a loosing industry in an area whose main potential is in tourism and recreation? 3

I strongly oppose opening the lands around the Washakie, North Absaroka, and Absaroka-Beartooth wilderness areas to oil and gas leases; it seems blatantly obvious that this fails to consider the need to take into account the effects of these activities on the entire Yellowstone ecosystem. I do not support the plan's supposition that this will not be detrimental to wildlife. Neither do I support its assumption that 4 5

111-1 Timber sales selected through the forest planning process have been selected to maximize present net value. Data is based on historic selling value and experienced costs. It is anticipated that future sales will not be "below cost" sales according to present knowledge of selling values and costs.

111-2 See response to comment 44-46.

111-3 Controls on the design of timber sales and standards and guidelines relating to the administration of timber cutting will prevent the ruination of timbered areas for recreation use. There are many different recreation opportunities on the Forest, some of which are compatible with timber harvest. The goal of the preferred alternative is to provide a balanced mix between all the potential uses of the Forest. See also response to comment 132-4.

111-4 See response to comments 51-3 and 35-4.

111-5 See response to comments 44-1, 44-43 and 182-5.

FPD-111-P-4-C
Proj. No. Orig Type Appl

wildlife and recreation will benefit from logging and road construction. Where are the alternatives ~~that~~ for other management options? As far as offering the public a choice, the plan is a sham. I have lived in Dubois for over twenty years and am as unconvinced by the Forest Service's reasoning on these issues as I convinced that it is hand-in-glove with the timber industry. 5

I would strongly suggest that the Forest Service eliminate all roads into roadless areas and from the following areas where it plans its timber sales - which I also oppose : Deep Lake, Dunoir Valley, Sawmill Creek, North of Sinks Canyon, lands surrounding Worthen Meadows, Fiddlers Lake to Christina Lake, and areas surrounding wilderness areas and Yellow stone National Park. I would further suggest that the forest be managed with a priority to serve wildlife, recreation and wilderness aesthetic. These, which are of lasting value, should be given the highest priority. These values serve the public to which the forests belong, not the private sector. 7

In conclusion I would urge you to act on your recommendations to manage the Clark Fork River to maintain its eligibility for wild and scenic status and to withdraw all wilderness and critical grizzly bear habitat from oil and gas developement. These are the only elements of the plan that are acceptable to those of us that have the long-term interests of this area at heart. 10 11

Sincerely yours,

Sharon Kahin

Sharon Kahin

111-7 There is no timber sale on the Clarks Fork Ranger District by the name of Deep Lake. See also response to comment 51-5.

111-10 The Proposed Plan incorrectly states that we can apply for an extension of the protection period for the River. It is contingent upon an act of Congress to protect the River either by including it in the Wild and Scenic River System or by providing additional temporary protection. It is uncertain at this point whether the Clarks Fork of the Yellowstone River will become a part of the National Wild and Scenic Rivers system. The Forest Service and the Administration are in favor of the River's inclusion. Management activities that are within the discretion of the Forest Service will be designed to maintain the River's eligibility. Other activities that are presently within the discretion of agencies such as BLM (minerals) or Federal Energy Regulatory Commission (hydropower development) could affect eligibility characteristics of the Clarks Fork. In the event such developments are proposed, we would recommend denial to the appropriate agency, until Congress acts. See also response to comment 97-1a.

111-11 See response to comments 51-3 and 68-8.

Comment 112

RECEIVED OCT 2 1985

FPD- 112- 0- L- C
Proj. No. Orig Type Affil

September 27, 1985

Mr. Steve Kealey
Forest Supervisor
P.O. Box 2140
Cody, Wyoming 82414

RE: Proposed Forest Plan

Dear Mr. Kealey:

As a property owner in the Table Mountain area, I wish to voice my strong opposition to the logging road proposed as part of the Forest Plan now before you for consideration (pages [illegible] and J-37). Thirteen miles of road are projected over [illegible] years to facilitate timber harvesting activities. No matter how great the benefit to be derived from the projected harvest of 0.4% per decade, it simply cannot justify the adverse impact on the region the road will inevitably cause. **1**

The Table Mountain and Burnt Mountain areas respond to a wide range of land-use demands in a sometimes precarious balance. Sportsman, Naturalist, hiker, rancher, wildlife, and endangered species all represent interests which must be constantly considered and evaluated if harmony is to be maintained. The road cannot help but upset that harmony, both immediately and in the long term.

First and most obviously, the road will put yet another man-made scar on the mountainside. But that is only the beginning. Once the road is in, it will open the floodgates to drastically increased and excessive motor vehicle traffic in the region. Historically logging roads in the area have remained open for recreational use long after timber harvesting has ceased. Dead man, Reef Creek, [illegible], and [illegible] Creek illustrate this trend with great clarity. It is an easier step to take to convert a preexisting road from one use to another, than to create one in the first place. Recreational interests have shown themselves able to effectively lobby the Forest Service for greater and greater motorized access. It is beyond debate that sportsmen and others will make unauthorized use of the road once it is in, and that over the fifty year term, recreational use will receive approval. **2**

Forest Service Response

112-1 In response to numerous concerns, the number of acres managed for timber harvest and the resultant amount of roads has been reduced in the final Plan. In the next fifty years, the Plan projects only eighty miles of new road which will be open to the public. There is projected 120 miles of existing road which will be improved and remain open to the public. An additional 150 miles of new road, and 255 miles of reconstructed existing roads are projected to be closed to the public within the 50 year period. Road construction and reconstruction figures have been corrected. See also response to comments 182-5, 33-9, 80-5, and 44-46.

The Forest Plan will guide management over the next 10 to 15 years and will be revised every 15 years or sooner in response to major changes in information or needs of the American public. Projections over 50 years are provided to portray long term consequences only.

112-2 Further economic analysis has shown that timber activity from the Table Mountain area during the first decade would not be viable; therefore, all timber harvest has been removed from the first decade schedule. The Plan has been revised to reflect this change.

Comment 112

Forest Service Response

FPD-112-0-1-C
Proj. No. Orig Type Affil

2.

As well-intentioned as the Forest Service may be, the road will place prohibitive demands on already ineffective policing activities. Unavoidably problems will go unchecked in the areas of vehicular misuse, fire danger, litter, water quality maintenance, and man-grizzly contact. 2

Based on the foregoing I implore you to find an alternative means of meeting timber harvesting needs in the area. The Forest Service knows better than anyone the importance of control in preserving the precious character of the Shoshone National Forest, and how tenuous that control can be at times. The proposed logging road is an irrevocable decision. The control you are surrendering can never be regained.

Yours truly,

Diane Bugas Flaherty

827 Santa Paula Way
Davis, California 95616

Comment 113

Forest Service Response

RECEIVED Sep 2 6 1985

FPO-113-F-L-C
Proj. No. Orig Type Appl

Sept 24
Linda Lewis
Box 343
Dubois Wy
82513

Steve Mealy
US Forest Service Supervisor
Shoshone National Forest
P.O. Box 2140
Cody Wy 82414

Dear Mr Mealy

We really need to harvest more timber on the Shoshone than is in that 50 year plan. | 1

The Shoshone is in bad shape and needs to be harvested so the new growth can take over.

There is plenty of room for everyone on our National Forest, Unless some only think of themselves.

The Wyoming timber business depends upon the harvest of trees from our national forest and so do lots of jobs. I am only one of several in Dubois.

Sincerely
Linda Lewis

VI-342

113-1 Timber Harvest levels in the Forest Plan have been established according to economic viability, and timber type and condition. Harvest levels in the Plan remain approximately the same as in the proposed Plan, and are slightly higher than levels of the last ten years.

Comment 114

Forest Service Response

RECEIVED OCT 3 1985

FPD-114-P-L-C
Proj. No. Orig Type Affil

Lloyd Zeman
16 Musser Road
Cody, WY 82414

October 2, 1985

Mr. Stephen P. Mealey
Forest Supervisor
225 W. Yellowstone Avenue
P.O. Box 2140
Cody, Wyoming 82414

Dear Steve:

First of all, I want to commend and congratulate you and your staff for the tremendous amount of work you have very obviously put into the proposed "Land and Resource Management Plan" and into the "Draft Environmental Impact Statement" of the Shoshone National Forest. It is a step in the right direction and I am particularly pleased at your recommendation to manage the Clarks Fork River to maintain its eligibility for wild and scenic. I am opposed to construction of a dam on the Clarks Fork and strongly support and request that you and the Forest Service do everything within your power to bring about the inclusion of 21.5 miles of the Clarks Fork in the National Wild and Scenic Rivers System.

I very much support the idea of allowing natural fires being allowed to burn out, except for perhaps saving marketable timber. This is natures way of "cleaning up" the forest and returning wildlife carrying capacity to former levels. In addition, I strongly support prescribed burns for habitat improvement as a sound management level of increasing wildlife carrying capacity . . . particularly on critical winter range. This should be expanded and made a more important part of the 50-year Forest Plan.

In addition, I am pleased with the idea of group mineral leasing now under study, but highly recommend and request that an Environmental Impact Statement be deemed a necessity prior to the leasing of any Shoshone Forest Service Land for the possibility of oil and gas development. I strongly support your recommendation to withdraw all wilderness and critical grizzly bear habitat from oil and gas development. But I don't believe that goes nearly far enough and strongly recommend that you withdraw all crucial or critical wildlife habitat, particularly that of bighorn sheep and elk habitat, from oil and gas leasing and development.

The plan leaves 930,000 acres of forest open to oil and gas leasing including most of the land surrounding the Washakie, North Absaroka and Beartooth Wilderness areas, as well as those lands bordering Yellowstone Park that are not designated as wilderness. Much of this land is crucial wildlife habitat and should be withdrawn from lands that can be leased for exploration and development. Most of the Forest land along the North Fork and South Fork of the Shoshone Rivers are critical bighorn sheep and elk habitat and should definitely be withdrawn.

Leasing these critical wildlife habitat areas for cattle grazing should also be eliminated. This past month and undoubtedly much longer, privately owned cattle have been not just grazing but devastating the winter range on the palisades of Jim Mountain which is among the most crucial winter range in this area. The cattle are

VI-343

1

114-1 The Proposed Plan incorrectly states that we can apply for an extension of the protection period for the River. It is contingent upon an act of Congress to protect the River either by including it in the Wild and Scenic River System or by providing additional temporary protection. It is uncertain at this point whether the Clarks Fork of the Yellowstone River will become a part of the National Wild and Scenic Rivers system. The Forest Service and the Administration are in favor of the River's inclusion. Management activities that are within the discretion of the Forest Service will be designed to maintain the River's eligibility. Other activities that are presently within the discretion of agencies such as BLM (minerals) or Federal Energy Regulatory Commission (hydropower development) could affect eligibility characteristics of the Clarks Fork. In the event such developments are proposed, we would recommend denial to the appropriate agency, until Congress acts. See also response to comment 97-1a.

1a

114-1a Prescribed burning for wildlife habitat improvement is substantially increased in the Plan compared to current direction.

2

114-2 Appendix K to the Plan outlines the NEPA process for dealing with oil and gas leases. The NEPA process will determine the level of Environmental Analysis required. See also response to comments 12-4, 68-8, 51-3, and 59-23.

3

114-3 See response to comments 59-23 and 34-2.

4

114-4 On crucial preferred winter ranges, needed forage for wintering wildlife population objectives are reserved. Utilization standards for domestic livestock will be lowered to provide for wildlife needs as necessary.

FPD-114-P-1-C
Proj. No. Orig Typo Affil

Mr. Stephen P. Mealey
October 2, 1985
Page 2

up high because that's where the water is available on the precise areas where our bighorn sheep are expected to be able to winter and give birth to their young next spring. This is a sickening example of mismanagement of crucial habitat on our National Forest for the personal gain of an individual. This is also happening on the upper end of the South Fork. If this is happening in areas that I happen to be familar with, I wonder how many other critical areas this same kind of mismanagement exists. 4

At the public meeting chaired by the District Forester at the Cody Convention Center July 16, we were lead to believe that this 50-year Forest Plan called for very few new roads in the Shoshone as "very few new roads will be needed". This made me feel good because in my opinion we have more than ample roads in the Forest and large roadless areas are what makes most of the Forest attractive and beckoning. These roadless areas are what makes the Forest a viable wilderness experience and provide for a balanced distribution and harvest of bighorn sheep and elk.

However, after having an opportunity to review the documents it seems that the USFS proposes to construct or reconstruct 665 miles of roads. This is an increase of a little over 46% and a far cry from what we were lead to believe at the scheduled public meeting last July. Much of this construction is planned in roadless areas close to the Washakie Wilderness, through areas heavily populated with wildlife and through a major elk migration route between Yellowstone and the East Fork elk winter range. Under this plan, many of the currently roadless areas will be lost. I am opposed to building of new roads and request that building of new roads and re-construction on old roads in roadless areas be reconsidered and eliminated from the Plan. The 1440 miles of existing roads in the Forest is more than enough to meet the needs of the public and I think you would do well to close some of the existing roads rather than build new ones. 5

Although I do not object to timbering as such on the Forest, it would seem that there is too much emphasis on sales below cost. If private industry is to benefit from timbering on the Forest, it should at least pay its way. Your plan to cut 10% more trees each year than is currently being harvested would necessitate more roads. And I do not agree with building any roads for the sake of timbering. And roads that have been built for this purpose and are in areas no longer being timbered, should be closed to everyone . . . including Forest Service personnel. 6

Also, any motorized vehicles should be prohibited on horse trails . . . an example being the Elks Fork. This summer I took my family for a weekend outing on the Elks Fork and about 5 miles up the trail and within a mile of the wilderness boundry our horses became startled and most difficult to control as three (3) three-wheelers came howling down the trail from the direction of the wilderness area, crushing small trees and grubbing out the fragile vegetation with their spinning and screaming huge tires. It's a shame when a relatively remote horsetrail is not a safe place to take a son or daughter for a weekend trailride/wilderness experience. Please set aside areas such as the North Absaroka and Washakie and other areas that are popular horseback and hiking areas and areas with a fragile environment as nonmotorized recreation management areas. 7

The Wyoming Regional Game and Fish Supervisor was quoted in the Cody Enterprise this summer as indicating that the North Fork area of the Shoshone did not have adequate elk habitat to support the Departments proposed management numbers. Yet recent Forest Service action and the Forest Service Plan would allow for more exploration and development of this crucial wildlife habitat area. 7a

114-5 In response to numerous concerns, the number of acres managed for timber harvest and the resultant amount of roads has been reduced in the final Plan. In the next fifty years, the Plan projects only eighty miles of new road which will be open to the public. There is projected 120 miles of existing road which will be improved and remain open to the public. An additional 150 miles of new road, and 255 miles of reconstructed existing roads are projected to be closed to the public within the 50 year period. Road construction and reconstruction figures have been corrected. See also response to comments 182-5, 33-9, 80-5, and 44-46.

114-6 Timber sales selected through the forest planning process have been selected to maximize present net value. Data is based on historic selling value and experienced costs. It is anticipated that future sales will not be "below cost" sales according to present knowledge of selling values and costs. Wildlife and recreation values have not been included in the calculations of PNV for the purposes of selecting sales for harvest.

114-7 The Forest Service is mandated by Congress to manage the land under a multiple use system. This means it must provide for a variety of uses. In addition, various user groups (horseback rides, backpackers, motorcyclists) desire to use some of the same areas. We must provide for these different types of use. The Plan reflects this for some areas.

114-7a Population will not be reduced by 37 percent. The Forest only has capacity to provide 63 percent of Wyoming Game and Fish population objective on Shoshone National Forest given the percentage of the total population the Game and Fish assigned the Forest. The present population is at or exceeds Game and Fish objectives; however, a large percentage is on private land.

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Mr. Stephen P. Mealey
October 2, 1985
Page 3

Oil, gas and mineral exploration and development is not a compatible multiple use of the Forest. Where allowed, it becomes a single use and should not be allowed on any areas of the Forest where there is important bighorn sheep and elk habitat. Since you say you are mandated to allow for oil and gas exploration and development, allow it only on areas where you will not do it at the expense of our renewable resources. Conflicts between wildlife and other Forest uses should be resolved in favor of wildlife, fisheries and associated recreation, as these are the largest assets of the Shoshone National Forest for which you have been given the management responsibility.

Very sincerely,

Lloyd Zeman

LZ/gs

cc: Senator Simpson and Wallop
Representative Dick Cheney
Governor Ed Herschler
R. Max Peterson, Chief, U.S. Forest Service
James Torrence, Regional Forester
Representative Bruce Vento
Senator James McClure

8 114-8 The General Mining Laws guide what can or cannot be withdrawn from mineral entry and under what conditions. We direct your attention specifically to Plan, Chapter III in the blue pages under Mining Law Compliance and Administration (General Direction 1C and 2) and Minerals Management Oil and Gas and Geothermal (General Direction 1). All direction found under Minerals Management, supplemented by Plan Appendix K, is intended to protect existing and proposed uses of the land for other resources thereby avoiding the need for withdrawal. If exceptional situations arise, or existing direction is shown to be insufficient, the option of withdrawal remains.

Mineral operations are by law, a viable use of public land. Our charter, provided by Congressional action, is to manage first according to law, and not strictly according to variable market pressures. The mining laws stipulate that lease applications can be made and must be considered for lands not withdrawn. The Forest Plan was selected in large part because it allows mineral activities while recognizing and maintaining the values of clean water, stable wildlife populations, and recreation opportunities which are of primary importance to many Forest users. The Forest Plan affords adequate protection of popular recreation areas, critical wildlife habitat, and other such resource values through application of stipulations and recommended operating procedures. Protection may be in the form of seasonal restrictions or no-surface-occupancy stipulations (see Appendix K of the Plan).

One consideration here is that a lease may never result in actual drilling activity; historically, a low percentage of leases are explored or developed, due in part to market fluctuations and uncertainties.

FPD-115-F-L-B
Proj. No. Orig Type Affil

RECEIVED OCT 3 1985

Dear Gentlemen: Oct. 1, 1985

I object to the entire Shoshone Forest Plan. It should be killed and the Forests left as they are.

A. Manchek

RECEIVED OCT 3 1985 Proj. No. Orig Type Affil

1

115-1 See response to comment 10-1.

A. Manchek B.A. M.A.
Riverton Wyo.
82501

WE MEET THE CHALLENGE

Shoshone Forest Plan
Yellowstone St.
Cody. Wyo.
82009
82414

RECEIVED
SHOSHONE NATIONAL FOREST
OCT 3 11 25 AM '85
U.S. FOREST SERVICE
CODY, WYOMING

Comment 116

Forest Service Response

RECEIVED ... 3 1985

FPD- 116- P- L- C
Proj. No. Orig Type Affil
9/30/85

Dear Mr. Mealey,

I reviewed the summary of the Draft EIS for the Shoshone NF and have the following comments.

1. The demand for recreation and wildlife far exceeds the demand for other uses on the Shoshone. In the spirit of "the greatest good for the greatest number" I can't see how we can avoid emphasizing these resources over others.

1 116-1 The Forest Service estimated demand for all types of Forest uses and has designed alternatives around those demands. The preferred alternative does emphasize recreation and wildlife over other uses. Also, individual prescriptions emphasize specific resources in certain areas while maintaining multiple-use throughout.

2. On page 62 the statement opportunities for economically dependent ranchers will be maintained implies that some ranchers will be phased out. The allotments on the north side of the Clarks Fork River from the Dilworth Ranch west are in critical elk winter range and at least some of the permittees are not what would be called economically dependent, in these areas and others like them. I feel livestock grazing should be eliminated in favor of wildlife. Again "the greatest good for the greatest number" philosophy should prevail.

2 116-2 On crucial preferred winter ranges, needed forage for wintering wildlife population objectives are reserved. Utilization standards for domestic livestock will be lowered to provide for wildlife needs as necessary.

Comment 116

Forest Service Response

FPD: 116: P: L: C
Proj. No. Orig Type Affil

3. On page 63 under Minerals, I think we're kidding ourselves if we think we can protect critical wildlife winter ranges from oil and gas development by the use of stringent measures. By leasing these areas their future potential to produce big game is compromised regardless of how difficult the stipulations are or what requirements an EIS may set forth. The only logical protection for these areas is not to lease them which is a viable alternative if overriding resource values are involved. I spent 2 years on the Custer N.F. (Little Mo Nat. Grasslands) during the oil and gas boom of the middle 1970's and know what can and will happen during oil field development even under the protection of an approved EIS.

Hopefully, the comments will be considered in the final EIS. Thank you for the opportunity to comment.

Sincerely

Ron Nordberg
8426 Carter Ave
Cody, Wy 82414

3

116-3 Proposals for oil and gas development will be subjected to the full NEPA process with ample opportunity for review by the Wyoming Game and Fish Department other agencies and the public.

Comment 117

Forest Service Response

Ref.: Forest Plan

RECEIVED Oct 3 1985

FPD-117-W-1-C
Proj. No. Orig Type Mail

October 1, 1985

Dave Roberts
7201 Bomar
Cheyenne, Wyoming 82009

Forest Supervisor
Shoshone National Forest
P.O. Box 2140
225 West Yellowstone Avenue
Cody, Wyoming 82414

VI-349

Dear Sir:

I have had an opportunity to review the Shoshone National Forest Proposed Forest Management Plan. It is certainly one of the better land use plans I have had an opportunity to review, and your staff is to be commended for their efforts.

I tend to prefer your Alternative "C" as my first choice, although Alternative "D" is not too bad either (my second choice). This plan calls for considerably less timber production (harvest) than most plans I've read, and as far as I'm concerned, that's good. The same can be said for livestock use. There are still some major problems with the mineral leasing process and procedures to make them more "need based" and systematic in practice. I would hope this whole mineral leasing process could be vastly improved in the

1

Thank you for your comment.

117-1 We feel that the procedure set forth in Plan, Appendix K provides strict controls on oil and gas leasing and operations for the maintenance and protection of surface resoruces. The procedure is systematic and flexible enough to permit consideration of new data and new concerns through additional environmental analysis at a later date. Note that the Bureau of Land Management, not the Forest Service, is the decision making agency for oil and gas operations. In any case, it is beyond our scope at the Forest level to make leasing decisions based on national need.

Comment 117

FPD 117 W L - C (1.)

near future.

Thank you for the opportunity to review the plan.

Sincerely yours,
Dave Roberts

Comment 118

RECEIVED OCT 3 1985

FPD - 118 - O - L - B
Proj. No. Orig. Proc. Acct.

WF IA

WESTERN FOREST INDUSTRIES ASSOCIATION

1500 S.W. TAYLOR STREET · PORTLAND, OREGON 97205

TELEPHONE
503-224-5455

October 1, 1985

Mr. Stephen P. Mealey
Forest Supervisor
Shoshone National Forest
P. O. Box 2140
Cody, Wyoming 82414

Dear Mr. Mealey:

Western Forest Industries Association (WFIA) submits these comments in response to the draft environmental impact statement (DEIS) for the Shoshone Forest Plan. Our Association represents small business lumber mills throughout the West.

The DEIS has failed to apply the National Forest Management Act (NFMA) planning process to the entire forest. The NFMA planning process that requires an assessment of resources, a projection of production capability, and an analysis of alternatives has only been applied to the non-wilderness portion of the Shoshone. Over one-half of the forest currently designated wilderness was exempt from the NFMA planning process. We think that neither Congress nor the National Environmental Policy Act condone shielding half of the forest from planning.

We are particularly concerned that the Shoshone has ignored the NFMA regulations. For instance, 36 CFR 219.12e requires the Forest Service to determine the ability of the planning area (including wilderness) to supply goods and services. Alternatives are required to range between the maximum and minimum resource potentials. The potential resource production from Shoshone wilderness acres should be included in the assessment of maximum outputs and alternative formulation. 1

Finally, the Shoshone Plan also violates the Council of Environmental Quality regulations which require the Forest Service to examine "illegal" alternatives when it is reasonable to do so. We believe it is reasonable to include alternatives with commodity production land allocations that would replace wilderness. We endorse the comments of the American Mining Congress and request

Forest Service Response

37-1 The National Environmental Policy Act of 1969 and its implementing regulations do provide for analysis of alternatives which violate existing law as stated by the commenters. This is generally in application of a general law to a specific area where the benefits and costs of that application have not been considered by decision makers. This is not the case in terms of designated wilderness areas. Each area designated as wilderness was done so on an area by area basis by Congress. They determined, for those areas being designated as wilderness, that there was sufficient information upon which to base a decision and that decision was to designate those areas as parts of the National Wilderness System. This is evidenced by the fact that in cases where they felt there was insufficient information on which to base their decisions, they would designate areas as "study areas" for which they requested further analysis and information. Two such areas are designated on the Forest (the Dunoir Special Management Unit and the Beartooth High Lakes Study Area). During scoping for Forest Planning nationally, regionally and locally, it did not appear appropriate to second guess Congress on their intent. Therefore, it was decided that such analysis was inappropriate unless requested by Congress. Such a request has not been received. Because of these reasons, analysis of "opportunity costs" of existing wilderness areas was not done.

Comment 118

FPD-118-0-L-B
Proj. No. Orig Typo Affil

that the Shoshone DEIS be revised to include a full range of alternatives for wilderness lands. 1

Sincerely,

WESTERN FOREST INDUSTRIES ASSOC.

Scott Horngren

Scott Horngren
Timber Supply Specialist

cc: Mr. Tom Nelson

RECEIVED OCT 3 1985

FPD - 119 - 0 - 1 - 8
Proj. No. Orig Type Afril

SARGENT RANCH
LEONARD R SARGENT

406-848-7276
JENSEN - 7798

CORWIN SPRINGS, MONTANA
59021

October 1, 1985

Supervisor Stephen P. Mealey
Shoshone National Forest
P. O. Box 2140
Cody, Wyoming 82414

Dear Mr. Mealey:

With regard to your National Forest Plan, I want to support very strongly your recommendations to withdraw all wilderness areas and critical grizzly bear habitat areas from any oil and/or gas exploration or development - those are totally incompatible uses, and the areas should be highly protected from such intrusions.

I also commend you for wishing to manage the Clark Fork River area to hopefully maintain its eligibility as a wild and scenic river.

The Greater Yellowstone Ecosystem is of critical national import and must be protected with the preservation of wildlife, recreation and scenery as its #1 prioity. Your forest is a critical part of that ecosystem, and therefore any conflicts should be resolved in favor of the wildlife of the area. 1

Please do NOT plan roads into roadless areas, which could spoil them forever and impact the wildlife detrimentally. For the same reason, timber sales should NOT be allowed in any critical grizzly bear habitat areas nor any other developments in such areas nor near any wilderness or Yellowstone National Park - nor in Deep Lake, Dunoir Valley, Sawmill Creek, North of Sinks Canyon, Worthen Meadows, Fiddlers Lake to Christina Lake. 2 3 2

Please add intelligent alternatives to your list which do NOT assume benefits to wildlife and your marvelous recreation by increasing roading and the harvesting of timber - a real non-sequitur! 5

Thank you for this opportunity to comment on your Forest Plan, and I do hope your final one will reflect considerably more protection for the incredible values of your forest in recreation and wildlife, particularly as an essential part of the Greater Yellowstone Ecosystem.

Sincerely yours,

Mrs. Leonard R. Sargent

VI-353

119-1 See response to comments 42-1 and 90-1.

119-2 See response to comments 44-46, 111-7, and 51-5.

119-3 In the 1984 Wyoming Wilderness Act, Congress directed that nonselected roadless areas be released for multiple use purposes, and that "buffer areas" were not to be considered adjacent to wilderness. With this in mind, the Wolf Creek timber sale has been included in the Forest Plan. Planned sales between Five Mile Creek and the Dunoir Special Management Unit have not been included in the Forest Plan; this has been allocated to Management Area 3A rather than Management Area 7E. No logging or road building will take place in the Dunoir Special Management Unit. See also response to comment 44-46.

119-5 See response to comments 44-43 and 182-5.

Comment 120

RECEIVED OCT 3 1985

FCD-120-0-L-C
Proj. No. Orig Type Ltr

October 1, 1985

Stephen P. Mealey, Supervisor
Shoshone National Forest
P.O. Box 2140
Cody, WY 82414

Dear Mr. Mealey,

Although I am in partial agreement with the Shoshone National Forest Plan, including maintaining the Clark Fork River for possible elgibility for wild and scenic status, and withdrawal of important grizzly bear habitat from mineral, gas and oil exlporation, I feel the plan fails to address certain critical concerns.

I urge you to support measures which will protect the Greater Yellowstone ecosystem which would include elimination of timber sales and roads from bear habitat, and new roads into roadless areas. It is particularly important that specific areas such as Sawmill Creek, land north of Sinks Canyon, land surrounding Worthen Meadows, Dunoir Valley, Fiddlers Lake to Christina Lake, Deep Lake, and areas surrounding wilderness areas near Yellowstone be kept free from timber sales and roads. Although the Forest Plan assumes wildlife will benefit from increased roads, I much prefer alternatives which do not make that kind of assumption. Any conflicts between Forest use and wildlife should be decided in favor of wildlife. The number of acres listed as suitable for logging should be pared down considerably. Roadless areas should be left roadless. 1

The Greater Yellowstone ecoysystem should be managed by placing the highest priorities on wildlife, recreation and scenery. Short-term profits are an unacceptable reason for tinkering with this delicate ecosystem. I urge your consideration of the above changes to the Shoshone National Forest Plan. 4

Sincerely,

Roger C. Hamett

11130 S.W. Walnut
Tigard, OR 97223

Forest Service Response

120-1 The Shoshone National Forest is 57 percent wilderness. The Wyoming Wilderness Act of 1984 specifically mentions release of lands not designated as wilderness for multiple use, specifically condemns the concept of nonwilderness buffers around designated wilderness, and states that lands not designated as wilderness need not be managed to preserve wilderness character. Many of the nonwilderness areas are protected from development because of being critical for wildlife, unproductive for wood fiber production, or critical for visual corridors. Regardless of entry into a few of the many remaining roadless areas, the Forest will remain overwhelmingly unroaded and more or less undeveloped. Our charter is to manage for multiple-use, not just preservation.

The uses of the Forest other than preservation and nonmotorized recreation, such as wood fiber production, domestic livestock production, oil and gas development, developed recreation, and motorized recreation, have been provided for to the extent possible given a stewardship objective. The Forest Service feels that these more commodity-oriented uses have been provided for in balance with the noncommodity uses in the preferred alternative.

In the 1984 Wyoming Wilderness Act, Congress directed that nonselected roadless areas be released for multiple use purposes, and that "buffer areas" were not to be considered adjacent to Wilderness. With this legal direction in mind, some timber sales and the accompanying roads have been scheduled in roadless areas, while other currently roadless areas have not been scheduled. See also response to comments 182-5 and 44-46.

120-4 See response to comment 44-1 and 90-1.

Comment 121

RECEIVED [illegible] 3 1985

FPD - 121 - W - L - C
Proj. No. Orig Type [illegible]

Supervisor Stephen P. Healey
Shoshone National Forest
P.O. Box 2140
Cody, WY 82414

Dear Mr. Healey:

I support your recommendations to maintain the Clark Fork River for wild and scenic status and to withdraw the wilderness and grizzly bear habitat from oil and gas development. 1

However, I plead with you to manage the Forest with the health of the Greater Yellowstone ecosystem and the preservation of wildlife and scenery as the highest priorities. 2

Please work to eliminate timber sales and roads and any other development that conflicts with the big game range and grizzly bear habitat, and to manage the Forest so that any conflicts are resolved in the favor of wildlife. 3

Sincerely,

[illegible]

F. Darline Kittel
[illegible]
Casper, WY [illegible]

Forest Service Response

121-1 The Proposed Plan incorrectly states that we can apply for an extension of the protection period for the River. It is contingent upon an act of Congress to protect the River either by including it in the Wild and Scenic River System or by providing additional temporary protection. It is uncertain at this point whether the Clarks Fork of the Yellowstone River will become a part of the National Wild and Scenic Rivers system. The Forest Service and the Administration are in favor of the River's inclusion. Management activities that are within the discretion of the Forest Service will be designed to maintain the River's eligibility. Other activities that are presently within the discretion of agencies such as BLM (minerals) or Federal Energy Regulatory Commission (hydropower development) could affect eligibility characteristics of the Clarks Fork. In the event such developments are proposed, we would recommend denial to the appropriate agency, until Congress acts. See also response to comment 97-1a.

The decision to recommend lease denial in Situation I is supported by two environmental analysis documents. In both cases, there were no public comments on these documents which opposed this decision. These documents are the DEIS for Oil and Gas Exploration and Leasing within the Washakie Wilderness and the 1982 Environmental Assessment of Oil and Gas Operations in Grizzly Bear Situation I and II. Further, the decision was supported by the U.S. Fish and Wildlife Service in their formal opinions written for these documents. The U.S. Fish and Wildlife Service recently issued a "no jeopardy opinion" on the Forest Plan. This opinion was partially based on lease denial on Situation I lands.

The decision in the Plan does not constitute a withdrawal for it is a temporary ban on leasing. If Situation I lands were withdrawn, leasing following recovery of the bear would require negation of the withdrawal.

The Plan selected the option of requiring no-lease as opposed to withdrawal because in the event of a recovered grizzly bear population, leasing would again be considered. Further, the cumulative effects studies currently underway might help us understand ways in which oil and gas activities may be accomplished with no effect on the Grizzly. Once the cumulative effects can be predicted, then the Interagency Coordinator Committee could consider the general opening of Grizzly Situations I to leasing and formally consult with U.S. Fish and Wildlife Service.

There are many other resource restrictions in Grizzly Bear Situation I habitat. Timber operations as well as recreational opportunities are limited in these areas.

121-2 See 24-1.

121-3 See response to comments 6-5 and 14-5.

Comment 122

Forest Service Response

RECEIVED OCT 3 1985

FPD - 122 - W - L - E
Proj. No. Orig Type Affil

Hot Springs County Sportsman's Association

THERMOPOLIS, WYOMING

P.O. Box 609

October 2, 1985

Stephan P. Mealey, Supervisor
Shoshone National Forest
P.O. Box 2140
Cody, WY 82414

Re: Shoshone National Forest Plan

VI-356

This letter is in support of the proposed Shoshone N. F. plan in favor of wildlife/recreation use over resource extraction. It is our opinion that preservation of the wild and scenic status, wildlife and recreation should receive highest priority in the future plan for management.

The Forest has been invaded and intruded upon for too long now by the unnecessary exploration and extraction by the oil companies and it is time that this comes to a halt. Such invasion into the prisine and natural environment is totally unacceptable at this time. If, however there is a National emergency whereby the resources there must be utilized, then extraction should be considered, but not until such time arrives. There is plenty of badlands, BLM and State land available for their damaging practices. 1

It is time that we preserve our natural gifts, the vast forests, and stop any unnecessary infringement and exploitation and conflicts between man and wildlife, and give wildlife the preference for a change. The GBoshone National Forest is too precious to lose to the greed of man. Let us have a plan that preserves the Forest and its inhabitants.

Very truly yours,

Glenn Bisnop

Glenn Bisnop, president

122-1 The General Mining Laws guide what can or cannot be withdrawn from mineral entry and under what conditions. We direct your attention specifically to Plan, Chapter III in the blue pages under Mining Law Compliance and Administration (General Direction 1C and 2) and Minerals Management Oil and Gas and Geothermal (General Direction 1). All direction found under Minerals Management, supplemented by Plan Appendix K, is intended to protect existing and proposed uses of the land for other resources thereby avoiding the need for withdrawal. If exceptional situations arise, or existing direction is shown to be insufficient, the option of withdrawal remains.

Mineral operations are by law, a viable use of public land. Our charter, provided by Congressional action, is to manage first according to law, and not strictly according to variable market pressures. The mining laws stipulate that lease applications can be made and must be considered for lands not withdrawn. The Forest Plan was selected in large part because it allows mineral activities while recognizing and maintaining the values of clean water, stable wildlife populations, and recreation opportunities which are of primary importance to many Forest users. The Forest Plan affords adequate pro ction of popular recreation areas, critical wildlife habitat, and other such resource values through application of stipulations and recommended operating procedures. Protection may be in the form of seasonal restrictions or no-surface-occupancy stipulations (see Appendix K of the Plan).

One consideration here is that a lease may never result in actual drilling activity; historically, a low percentage of leases are explored or developed, due in part to market fluctuations and uncertainties.

RECEIVED OCT 3 1985

FPD-123-0-1-C
Proj No. Orig Type Attch

October 1, 1985

Stephen P. Mealey, supervisor
Shoshone Nat'l Forest
P. O. Box 2140
Cody, WY 82414

Dear Mr. Mealey:

I've been looking at your draft forest plan and environmental impact statement (in fact I've been staring at these 2 massive volumes for quite a while). Here are my comments for the public record.

I'm familiar with a Shoshone National Forest from a number of backpacking trips into the Washakie Wilderness and the DuNoir Special Management Unit, short day hikes into the North Absaroka Wilderness, and from car camping along all of the state and U.S. highways that penetrate the forest. I wrote a trail guide to the nearby Teton Wilderness on the B-T Nat'l Forest.*

In general I support the thrust of your plan. It's time everybody realized that the Greater Yellowstone Ecosystem is not the first place we should be cutting marginal timber and exploring for oil.

There are some items I don't like, however. Please don't build the Brent Creek road to Trail Lake in the DuNoir. The elk migration to the East Fork Winter Range is already a narrow corridor. This road would reduce it further. 1

I think there's too much management area 3A which should instead be management area 3B -- specifically in Trout Creek adjacent to the North Absaroka Wilderness, and in the vicinity of Aldrich Basin just to the northeast of the Washakie Wilderness. 2

I'm disappointed to see use of management area 2A for Bonneville Pass and the Jade Lake, Rainbow Lake area above Brooks Lake. This area is too mucky for recreational vehicle use. The clay on the trail to the Teton Wilderness sticks to your feet in 5 pound clods when wet. It's a terrible mudhole without motorized vehicles. You'll need to do a lot of trail work for it to sustain vehicles. In addition, I hate to think of the damage trail machines would do in the wet meadow on Bonneville Pass. 3

* Ralph Maughan, Beyond the Tetons: A Backpacker's Guide to the Teton Wilderness. (Boulder, CO, Pruett Pub. Co., 1981).

123-1 In the 1984 Wyoming Wilderness Act, Congress directed that nonselected roadless areas be released for multiple use purposes, and that "buffer areas" were not to be considered adjacent to wilderness. With this in mind, the Wolf Creek timber sale has been included in the Forest Plan. Planned sales between Five Mile Creek and the Dunoir Special Management Unit have not been included in the Forest Plan; this has been allocated to Management Area 3A rather than Management Area 7E. No logging or road building will take place in the Dunoir Special Management Unit. See also response to comment 44-46.

123-2 The Forest Service does not agree with a proposal to change the management direction emphasis in Analysis Areas 150-Logan Mountain, 138-Dunn Creek, and 155-Trout Creek to a 3B management emphasis. The Logan Mountain area has a very low standard road in it which is utilized by mechanized equipment by the existing range permittee to carry out management activities. The 7E area in the Trout Peak area has been changed to a 3A management emphasis. Existing system trails, developed trailheads, range structures, Robber's Roost cabin, and an outfitter camp precludes these areas from being managed under a 3B emphasis.

123-3 The majority of the area in question has been re-allocated to 3A. None has been allocated to 3B.

Comment 123

EPD-123-0-L-C
Proj. No. Orig Type Affil

I'm not fond of your names for the three classes of wilderness management: semi-primitive, primitive, and pristine. The Wilderness Act defines Wilderness as "primitive." It would be better to call them something like "class I, class II, and class III."

Furthermore, I think you have an excess of management area 8C and 8B. You seem to think that for an area to be "pristine" (8A) it must be at least 3 miles from a system trail (8C). My experience in wilderness areas is that it's as much topography as distance from a trail that makes an area pristine. For example, you'll hardly ever find anyone down in Cabin Creek or Fall Creek or the mountains between them, despite their proximity to the busy South Fork (Shoshone) trail in the Washakie Wilderness. It's just too rough a country. It's very pristine as soon as you climb a half mile off of the S. Fork Trail.

Your 8A areas are all remote mountaintops, but much of your proposed 8B management area, lower down on the mountains, is just as empty of people and even more secluded (due to shorter line of sight) than the 8A mountaintops. 4

Your 8C management direction makes sense (but not the name "semi-primitive"). However, most 8C management areas are too large. For example, the meadow of Five Pockets is busy, busy, busy; and should be 8C. However, the pockets themselve have no system trails, only game tracks and few people. I hiked up Bear Pocket and over the top (down a steep snow slope) and into Hidden Basin. I saw no sign of past human presence in Bear Pocket (8C), but I saw quite a few people (and a lot of horses) at Hidden Basin (an 8B area). I saw no one in two days in Bear Pocket (8C).

Due to the scant use of the North Absaroka, I'm skeptical about any 8C areas (except the North Fork of the Shoshone).

You mention "required access roads" in designated wildernesses (8B and 8C). One does not require access roads in designated wildernesses, although in theory miners may have to be allowed to build a road to a valid existing claim. You indicate that such roads will not be authorized on slopes over 60%. I think this is much too steep and could never be reclaimed even if other conditions on the site seemed favorable. 5

Finally, let me commend you for recommending designation of the Clark's Fork as a unit of the National Wild and Scenic Rivers System.

Please mail me a copy of the final environmental statement and land use plan. Thank you for your attention.

Sincerely,

Ralph Maughan

Ralph Maughan
Box 8264
[illegible]

Forest Service Response

123-4 User capacity definitions are dervived from the Recreation Opportunity Spectrum Users Guide, a USDA Forest Service publication. This system was further refined by wilderness research conducted at Colorado State University and the Rocky Mountain Research Station by Driver, McConnel and Brown. The names applied to the different areas, (semiprimitive, primitive, and pristine) are from the original publication. While these may be confusing, it would cause more confusion to rename them. The definitions are based upon sampling of wilderness users for their preferences and needs for wilderness experiences. While not foolproof and not acceptable to some, these numbers do represent state-of-the-art wilderness research.

Some areas now classified as 8B, primitive wilderness, must remain as such because of grazing activities. Grazing inside wilderness is mandated by the 1964 Wilderness Act and subsequent legislation and regulations. Other areas do not qualify as 8A because of traditional user patterns, evidence of human presence, or proximity to trails and other facilities. Existing delineations of 8A, 8B, and 8C management areas are the Forest Service "best guess" at the present time. These delineations can be changed as the need arises.

Existing laws permit the development of valid mineral claims inside wilderness and in some cases this may mean the construction of roads if such are needed for the claimout to reasonably develop his mineral rights.

123-5 Few valid claims exist in wilderness on the Shoshone National Forest. Naturally, every effort would be made to minimize impacts of roads in wilderness.

Comment 124

RECEIVED OCT 3 1985 FFD - 124 - P - L - C
Proj. No. Orig Type Appl

Bruce Fauskee
953 Road 2
Powell, Wyoming
October 1, 1985

Forest Supervisor
Shoshone National Forest
P.O. Box 2140
Cody, Wyoming 82414

IA-359

Dear Sir:

I am writing this letter to express my concern over the future of the Shoshone National Forest. I spend many hours each year enjoying the forest. I use the forest for fishing hunting and camping. I hope the forest can be preserved in much the same state it is now so my sons and their children can enjoy it as I have. Once the land is developed it is no longer the pristine area it is now.

FPD 124 P L C 2

First I feel no oil and gas leasing should be allowed on the forest. I have been employed by a major oil company for the past seven years. My experience with the oil business has shown me the oil business does not belong on the national forest. I do realize we need oil and gas but feel there are many other places to search for oil. The development of our forest would pose a serious problem to wildlife, fish and the ~~asthic~~ aesthetic value of the forest. 1

The sale of timber is both a joke environmentally and economically. The effects of road building on our wildlife would be devistating. Especially elk, sheep and bear as neither of these species enjoy human company. The roads would increase poaching and wildlife harrassment. The cost of preparing 2

124-1 The General Mining Laws guide what can or cannot be withdrawn from mineral entry and under what conditions. We direct your attention specifically to Plan, Chapter III in the blue pages under Mining Law Compliance and Administration (General Direction 1C and 2) and Minerals Management Oil and Gas and Geothermal (General Direction 1). All direction found under Minerals Management, supplemented by Plan Appendix K, is intended to protect existing and proposed uses of the land for other resources thereby avoiding the need for withdrawal. If exceptional situations arise, or existing direction is shown to be insufficient, the option of withdrawal remains.

Mineral operations are by law, a viable use of public land. Our charter, provided by Congressional action, is to manage first according to law, and not strictly according to variable market pressures. The mining laws stipulate that lease applications can be made and must be considered for lands not withdrawn. The Forest Plan was selected in large part because it allows mineral activities while recognizing and maintaining the values of clean water, stable wildlife populations, and recreation opportunities which are of primary importance to many Forest users. The Forest Plan affords adequate protection of popular recreation areas, critical wildlife habitat, and other such resource values through application of stipulations and recommended operating procedures. Protection may be in the form of seasonal restrictions or no-surface-occupancy stipulations (see Appendix K of the Plan).

One consideration here is that a lease may never result in actual drilling activity; historically, a low percentage of leases are explored or developed, due in part to market fluctuations and uncertainties.

124-2 Timber harvest levels in the Forest Plan have remained approximately at the level of the proposed Forest Plan. The number of acres proposed for treatment has been reduced. This reduction in acreage reflects less emphasis on steeper, less productive areas (primarily stocked with lodgepole pine) and more emphasis on areas with higher productivity. Harvest levels have been established according to the economic viability of individual areas. Forest standards and guidelines are established which will insure that timber sales will not have adverse effects on wildlife, recreation, water, scenic beauty or other resources.

FPD 124: P - L - C (3)
Proj. No. Orig Type Addl

and maintaining roads for the timber industry seems to be more than the money gained from the sale. I don't see how this could done in the best interest of our forest. 2

The livestock grazing on our national forest should slowly be phased out. The livestock that uses our national forest provides only a small percentage of the national meat supply. It seems most of the grazing rights are held by large ranches. Those ranches are often owned by large corporations or even crime families. I don't see why we should provide these groups with cheap grazing rights at the expense of our forest and wildlife. I worked two years for the SCS and saw first hand how many of the leases are being over grazed and abused. 3

124-3 On crucial preferred winter ranges, needed forage for wintering wildlife population objectives are reserved. Utilization standards for domestic livestock will be lowered to provide for wildlife needs as necessary.

FPD- 124- P- L- C- (4)

I feel we are very fortunate to live in an area as beautiful as ours. If we develope an area it will never again be what it was. Many times the areas that are to be developed are area used heavely by wildlife for winter range. The loss of any winter habitat or calving areas will drastically ~~effect~~ lower the carring capacity of our forest. 3

I appreciate the fact you plan to make the Clarks Fork a wild and senic river. Some of the plans that I've read on how to develope the Clarks Fork are really far fetched. Making the Clarks Fork wild and senic would preserve a beautiful river and also save us lots money being spent on useless winter forage studies. 5

I hope your decisions on how to manage our forest will allow

124-5 The Proposed Plan incorrectly states that we can apply for an extension of the protection period for the River. It is contingent upon an act of Congress to protect the River either by including it in the Wild and Scenic River System or by providing additional temporary protection. It is uncertain at this point whether the Clarks Fork of the Yellowstone River will become a part of the National Wild and Scenic Rivers system. The Forest Service and the Administration are in favor of the River's inclusion. Management activities that are within the discretion of the Forest Service will be designed to maintain the River's eligibility. Other activities that are presently within the discretion of agencies such as BLM (minerals) or Federal Energy Regulatory Commission (hydropower development) could affect eligibility characteristics of the Clarks Fork. In the event such developments are proposed, we would recommend denial to the appropriate agency, until Congress acts. See also response to comment 97-1a.

Comment 124

FPD-124- P- L- C (5)
Proj. No. Dr

future generation to enjoy a forest as great as the Shoshone National Forest is today.

Yours Truly,

Bruce Fanskee

Comment 125

RECEIVED ... 3 1985

FPD-125 P - L C
Proj. No. Orig Type Appl

To whom it may concern,

I am opposed to the proposed 50-year plan. This plan allows for to much road construction and timbering, these things lead to the destruction of the forest as a place for recreation. 1

There are also need to be more steps taken to protect the forest from additional oil and gas leasing, as these also tend to destroy the forest. 2

Sincerely,

Dorman Lund
Powell, Wy

Dorman Lund
[illegible]
Powell Wy 82435

Forest Service Response

125-1

In response to numerous concerns, the number of acres managed for timber harvest and the resultant amount of roads has been reduced in the final Plan. In the next fifty years, the Plan projects only eighty miles of new road which will be open to the public. There is projected 120 miles of existing road which will be improved and remain open to the public. An additional 150 miles of new road, and 255 miles of reconstructed existing roads are projected to be closed to the public within the 50 year period. Road construction and reconstruction figures have been corrected. See also response to comments 182-5, 33-9, 80-5, and 44-46.

125-2

The General Mining Laws guide what can or cannot be withdrawn from mineral entry and under what conditions. We direct your attention specifically to Plan, Chapter III in the blue pages under Mining Law Compliance and Administration (General Direction 1C and 2) and Minerals Management Oil and Gas and Geothermal (General Direction 1). All direction found under Minerals Management, supplemented by Plan Appendix K, is intended to protect existing and proposed uses of the land for other resources thereby avoiding the need for withdrawal. If exceptional situations arise, or existing direction is shown to be insufficient, the option of withdrawal remains.

Mineral operations are by law, a viable use of public land. Our charter, provided by Congressional action, is to manage first according to law, and not strictly according to variable market pressures. The mining laws stipulate that lease applications can be made and must be considered for lands not withdrawn. The Forest Plan was selected in large part because it allows mineral activities while recognizing and maintaining the values of clean water, stable wildlife populations, and recreation opportunities which are of primary importance to many Forest users. The Forest Plan affords adequate protection of popular recreation areas, critical wildlife habitat, and other such resource values through application of stipulations and recommended operating procedures. Protection may be in the form of seasonal restrictions or no-surface-occupancy stipulations (see Appendix K of the Plan).

One consideration here is that a lease may never result in actual drilling activity; historically, a low percentage of leases are explored or developed, due in part to market fluctuations and uncertainties.

RECEIVED OCT 3 1985

FPD - 126 W - 6 - C
Proj. No. Orig Type Affil

Dear Mr. Mealey,

With regard to your forest plan for the Shoshone: Please sir consider your area is one of a kind, in a ecosystem that is above monetary values. Work toward harmony with Nature. Eliminate conflicts with a fragile system that we people do not yet fully comprehend, or appreciate. Please no more roads! 1

Let the horse loggers and public firewood hunters cut the dead fall but please no new roads. If you must have an energy user set up solar collectors or wind generators but let the oil folks rape someone else. 2 3

Consider that cattle do change the blend and balance of forage. Its not Free, charge the cattlemen reasonable costs. 4

Please look at your forest as part of a valuable yellowstone system and not an independent forest area. Nature and wildlife are your most important assets. work with them not against them. 5

From a forest user,

Steven Poole
Box 235
Moose, WY 83012

126-1 The personnel who work on Shoshone National Forest by and large feel strongly about managing the land in harmony with nature. The Forest Service charter involves balancing competing demands on the Forest with stewardship as an overriding objective.

126-2 In response to numerous concerns, the number of acres managed for timber harvest and the resultant amount of roads has been reduced in the final Plan. In the next fifty years, the Plan projects only eighty miles of new road which will be open to the public. There is projected 120 miles of existing road which will be improved and remain open to the public. An additional 150 miles of new road, and 255 miles of reconstructed existing roads are projected to be closed to the public within the 50 year period. Road construction and reconstruction figures have been corrected. See also response to comments 182-5, 33-9, 80-5, and 44-46.

126-3 The General Mining Laws guide what can or cannot be withdrawn from mineral entry and under what conditions. We direct your attention specifically to Plan, Chapter III in the blue pages under Mining Law Compliance and Administration (General Direction 1C and 2) and Minerals Management Oil and Gas and Geothermal (General Direction 1). All direction found under Minerals Management, supplemented by Plan Appendix K, is intended to protect existing and proposed uses of the land for other resources thereby avoiding the need for withdrawal. If exceptional situations arise, or existing direction is shown to be insufficient, the option of withdrawal remains.

Mineral operations are by law, a viable use of public land. Our charter, provided by Congressional action, is to manage first according to law, and not strictly according to variable market pressures. The mining laws stipulate that lease applications can be made and must be considered for lands not withdrawn. The Forest Plan was selected in large part because it allows mineral activities while recognizing and maintaining the values of clean water, stable wildlife populations, and recreation opportunities which are of primary importance to many Forest users. The Forest Plan affords adequate protection of popular recreation areas, critical wildlife habitat, and other such resource values through application of stipulations and recommended operating procedures. Protection may be in the form of seasonal restrictions or no-surface-occupancy stipulations (see Appendix K of the Plan).

One consideration here is that a lease may never result in actual drilling activity; historically, a low percentage of leases are explored or developed, due in part to market fluctuations and uncertainties.

126-4 Grazing fees are not controlled at the Forest level but established at National levels.

126-5 See response to comment 24-1.

Comment 127

RECEIVED OCT 3 1985
~~Proj. No. Orig Typo Arrl~~

FPD-127-W-L-C
Proj. No. Orig Typo Arrl

October 1, 1985

Neil and Jennifer Miller
Star Rte Box 74
Basin, Wy. 82410

Supervisor Stephen P. Mealey
Shoshone National Forest
P.O. Box 2140
Cody, Wy. 82414

Dear Supervisor Mealey,

The proposed Shoshone National Forest plan is a great concern to us as it will manage an area that is very dear to our heart.

We support the Forest plan recommendation to manage the Clark Fork River to maintain its eligibility for wild and scenic status. We also favor the recommendation to withdraw all wilderness and critical grizzly bear habitat from oil and gas development. 1

The Beartooth Mountains bring us much peace and pleasure. Please recommend that no new road to built in this area. Also please protect the Deep Lake area from timber harvest. 2

Please protect the Beartooth, North Absaroka, Fitzpatrick, Popo Agie, and Washakie Wilderness areas and areas bordering Yellowstone National Park from road building 3

Forest Service Response

127-1 The Proposed Plan incorrectly states that we can apply for an extension of the protection period for the River. It is contingent upon an act of Congress to protect the River either by including it in the Wild and Scenic River System or by providing additional temporary protection. It is uncertain at this point whether the Clarks Fork of the Yellowstone River will become a part of the National Wild and Scenic Rivers system. The Forest Service and the Administration are in favor of the River's inclusion. Management activities that are within the discretion of the Forest Service will be designed to maintain the River's eligibility. Other activities that are presently within the discretion of agencies such as BLM (minerals) or Federal Energy Regulatory Commission (hydropower development) could affect eligibility characteristics of the Clarks Fork. In the event such developments are proposed, we would recommend denial to the appropriate agency, until Congress acts. See also response to comment 97-1a.

The decision to recommend lease denial in Situation I is supported by two environmental analysis documents. In both cases, there were no public comments on these documents which opposed this decision. These documents are the DEIS for Oil and Gas Exploration and Leasing within the Washakie Wilderness and the 1982 Environmental Assessment of Oil and Gas Operations in Grizzly Bear Situation I and II. Further, the decision was supported by the U.S. Fish and Wildlife Service in their formal opinions written for these documents. The U.S. Fish and Wildlife Service recently issued a "no jeopardy opinion" on the Forest Plan. This opinion was partially based on lease denial on Situation I lands.

The decision in the Plan does not constitute a withdrawal for it is a temporary ban on leasing. If Situation I lands were withdrawn, leasing following recovery of the bear would require negation of the withdrawal.

The Plan selected the option of requiring no-lease as opposed to withdrawal because in the event of a recovered grizzly bear population, leasing would again be considered. Further, the cumulative effects studies currently underway might help us understand ways in which oil and gas activities may be accomplished with no effect on the Grizzly. Once the cumulative effects can be predicted, then the Interagency Coordinator Committee could consider the general opening of Grizzly Situations I to leasing and formally consult with U.S. Fish and Wildlife Service.

There are many other resource restrictions in Grizzly Bear Situation I habitat. Timber operations as well as recreational opportunities are limited in these areas.

Oil and gas leasing is prohibited in legislated wilderness areas, per the Wilderness Act of 1964 as amended.

127-2 The Forest Plan does not schedule any road building on the Beartooth Plateau nor any timber harvest near Deep Lake.

127-3 See response to comments 44-46 and 51-5.

FPD- 127- W- L- C

and timbering by designating these areas 3B rather than the currently proposed 3A. 3

Please keep our current roadless areas roadless.

Please spend less money on timber harvest and reduce timber harvest and sales. Less timbering will reduce soil erosion and water pollution and fewer lumber roads will have a less disruptive influence on wildlife, especially sheep, bears, and elk. 4

Curb oil and gas leasing and request a Congressional withdrawal of Grizzly Bear Situation One Habitat. Prohibit oil and gas leasing in lands surrounding the Washakie, North Absaroka, and Absaroka-Beartooth Wilderness areas. 5

Thank you for all the work you do to manage our forests. Let's keep 'em wild.

Sincerely,

Ned O Miller
Jennifer J. Miller

127-4 In response to numerous concerns, the number of acres managed for timber harvest and the resultant amount of roads has been reduced in the final plan. In the next fifty years, the plan direction calls for only eighty miles of new road construction which will be open to the public. There will be an additional 120 miles of existing road which will be improved, and will remain open to the public. An additional 150 miles of new road, and 255 miles of reconstructed existing roads will be closed to the public within the 50 year period. Road construction and reconstruction figures have been corrected. See also response to comments 182-5, 44-46 and 33-9.

127-5 See response to comment 127-1.

There is no legal mandate or precedent for providing "no lease" buffer zones as you suggest. Rather, congressional intent runs in opposition to the establishment of wilderness buffers, as stated in the Wyoming Wilderness Act of 1984.

Comment 128

RECEIVED OCT 3 1985

FPD - 128 - W - L - E
Proj. No. Orig Type Area

SIERRA CLUB, WYOMING CHAPTER, SNOWY RANGE GROUP
514 RUSSELL, LARAMIE, WY 82070

October 1, 1985

Mr. Stephen P. Mealey, Supervisor
Shoshone National Forest
225 W. Yellowstone Avenue
P.O. Box 2140
Cody, WY 82414

Dear Mr. Mealey,

This letter represents the comments of the Snowy Range Group of the Sierra Club on the draft Land and Resource Management Plan (Plan) and draft Environmental Impact Statement (DEIS) for the Shoshone National Forest (Forest).

General Critique

We have several general criticisms of the documents:

1) There is considerable redundancy between the Plan and the DEIS, resulting in a considerably larger set of documents than necessary. Cannot some of this redundancy be eliminated for the sake of the reader? 1

2) There should be a much greater emphasis on graphics for the presentation of material now confined to unwieldy tables. This is particularly important for the Summary, which should be designed with the layperson in mind. 2

3) It is our understanding that all acreage not in Wilderness status or identified as critical grizzly bear habitat will be open to leasing. This fact should be stated explicitly. We believe that much less land should be available for leasing. 3

4) Chapter IV of the DEIS is extremely weak. Little or no quantitative information on the current or projected future impacts of various management activities on physical and biotic resources is given. It is impossible for a scientist, let alone a layperson, to judge whether or which management activities have the most or least impact on resources. We have yet to see a single Forest Plan in which "Environmental Consequences" are given the scientific detail and rigor they require. 4

5) The Monitoring and Evaluation section of the Plan is very vague and gives no confidence in your ability to attain Plan objectives. 5

6) Little information is presented on the impacts of the Plan on existing Roadless Areas. A special Roadless Area analysis, similar to that published in the Bighorn DEIS or the unpublished Appendix G to the Medicine Bow DEIS, should be included in your DEIS. Specific information the public deserves to know, for each Roadless Area, is the number of miles of roads to be constructed, the amount of acres to be subject to timber harvest, and the PNV of each alternative. 6

Forest Service Response

128-1 Admittedly there is redundancy, much of which has evolved as needs arose. Chapter II of the EIS is to present and compare alternatives. While reading Chapter II of the EIS, would the reader like the information contained in Chapter IV collected and summarized or would a reader want to be referenced innumerable times to places in Chapter IV? Or conversly, in reading EIS, Chapter IV would a reader want to be referenced repeatedly to Chapter II for information? The summary section to the EIS is just that and of course would be redundant when compared with the body of the document. The Plan is designed to be a stand-alone document upon approval and hence the Management Situation chapter contains all of the Affected Environment chapter of the EIS.

128-2 We agree with the reviewer. Unfortunately due to budget cutbacks and time frames to complete the plan we are unable to improve on the graphics in the FEIS and Plan.

128-3 The Errata Sheet which accompanied the DEIS and proposed plan included a tabular estimate of the acres available for leasing. The items in the table identify those areas or types of areas not available. This is an explicit statement which is now included in Chapter IV of the FEIS under Minerals.

128-4 There are practical limits to what can be included in Chapter IV. We believe the FEIS is adequate for a reasoned choice among alternative Forest program emphases. As stated in the errata sheet for Chapter III of the Proposed Plan, item 4, "... the adequacy of existing analysis and disclosure [of effects] will be evaluated and additional analysis and disclosure carried out as appropriate". This wording has been retained in the Plan Chapter III under the section entitled IMPLEMENTATION.

Monitoring and evaluation of the implementation of Forest Plans are required by 36 CFR 219.12(k). Funding for these activities are currently being built into agency budget requests. Funding for an adequate monitoring program will become a part of the Forest Service's regular budget. Should adequate funding for monitoring not be appropriated by Congress, plans will be made to provide for monitoring within available resources since this action is required by law.

As stated in DEIS, Chapter IV, details of monitoring are included in documents incorporated by reference. Such documents are available for public review.

128-6 Passage of the Wyoming Wilderness Act of 1984 stated that all "roadless" areas not specified as wilderness were released for multiple-use management. Analysis for the Plan, therefore, focussed on the most cost efficient way of managing these lands in concert with adjoining lands to meet forestwide goals and objectives. Analysis of such decisions by roadless area was not done. The Big Horn National Forest DEIS was completed before the passage of this Act and that is why such an appenidix appeared within it. The Medicine Bow had just completed this analysis as the Act was passed and because of the Act, did not include it in their published DEIS. The reason this was not done on the Shoshone was the timing of analysis in relation to the Act and an attempt to comply as fully as possible with the intent of Congress.

Comment 128

FPD - 128 W L E
Proj. No. Orig Type [illegible]

We also have several general praises:

1) The use of Management Areas, although complex, permits tailoring of management prescriptions to specific geographic regions. If the Forest is treated as a single entity, FORPLAN may proscribe prescriptions based on average values for the entire Forest, prescriptions which will be inappropriate for some specific areas.

2) Your intention to preserve the Wild and Scenic River eligibility of the Clark's Fork and critical grizzly bear habitat.

3) The detailed discussion of water quality problems and mitigation measures contained in Appendix G of the Plan.

Comments on Draft Plan

1) Page II-8: The figures in these tables should be broken out by specific categories as well as by programs. For example, there are expenditures for road construction and maintenance within the Facilities, Timber, Minerals, and Recreation programs. These should be shown as a single "Roads" value. 8

2) Pages II-4 to -17: The description of Social Impact Units is the most thorough and interesting we have seen.

3) Pages II-36 to -39: Your three-category ROS classification for Wilderness is a great idea because it allows for more flexible management.

4) Pages III-2 to -4: This list of reference materials is very handy.

5) Pages III-5 to -9: Presented here is the most comprehensive, clearest list of management goals we've seen in any Plan. We strongly urge that the following goals be added: 1) "Any degradation of the physical and biotic resources of the Forest, as indicated by baseline data monitoring, will be ameliorated as promptly as possible. Such action takes precedence over the attainment of other objectives of the Plan." 2) "The Plan shall strive, to the greatest extent possible, to maintain the health and integrity of the Greater Yellowstone ecosystem." 3) "No timber harvest or road construction will be planned in existing Roadless Areas." 9 10

6) Pages III-9 and III-20 to -21: We are strongly in favor of management direction aimed at preserving the eligibility of the Clark's Fork for Wild and Scenic River status.

7) Page III-13: Miles of new road construction and of road reconstruction should be shown separately. Also, the number of acres available for oil and gas leasing should be given. 12

8) Page III-51 & -55: General directions #2 and #4 under Range Resource Management are very important.

9) Page III-68 & -69: General Direction #1 under Water Uses Management is an excellent idea. Under Water Resource Improvement and Maintenance, we support Directions #4 and #5 but are opposed to Direction #2. All Forest activities should be designed to prevent degradation of water quality. Best Management Practices should not be relied on unless they consistently maintain water quality. 13

10) Page III-91: These guidelines to prevent soil erosion are

Forest Service Response

128-8 Over 140 catagories of practices, outputs and effects and their economic values were included in analysis. These can be displayed in many ways including a pure item by item tablulation. The purpose of Chapter II of the Plan is to provide a summary discussion of the current management situation. The purpose of Appendix B in the EIS is to provide a summary discussion of a complex set of analyses. Complete item by item tabulation would tend to be overwhelming forestwide. Therefore, only the major programs and results of analysis were included.

The intent of Appendix J of the Plan is to provide area by area breakdowns of what is planned. In this section, major practices planned, major outputs produced and indications of effects are tabulated by category. This includes a break out of road construction and road maintenance planned by area. Thus the information requested is presented in the documents and interested readers are directed to that Appendix.

128-9 The goal as stated needs clarification. Is "any degradation" really what is meant or needed? Consider the biotic resources in an area where a new campground is to be built: are they degraded by the campground? Some degradation might be desirable in providing public benefits. No single objective has precedence in the Plan. Conflicting objectives are weighed depending on the specifics of the situation at hand.

128-10 The term "Greater Yellowstone Ecosystem" has not been defined and indeed depends on perspective. Before such a goal statement could be made, terms used therein would have to be defined. Also see response to 24-1.

128-12 See response to comment 33-4 and Chapter 4 of EIS.

128-13 General Direction 2 has been revised. We feel it is sufficient to say that we will improve or maintain water quality to meet State water quality standards. Approval of Best Management Practices is contingent upon the demonstration of a practice to be consistent in its positive effects. The mechanism for such approval involves trial and error, monitoring, and the cooperation and support of Wyoming State Department of Environmental Quality.

Comment 128

FPD- 128- W- L- E
Proj. No. Orig Type Affil

excellent.

11) Page III-99: All new trails should be constructed to primitive, foot travel only standards unless the Plan specifically calls for horse and/or motorized standards necessary to meet demands in specific areas. Arbitrary upgrading of trails is expensive and often results in horse or motorized use of trails which formerly saw only foot use. 14

12) Page III-101: A "let burn" policy should be considered for Wilderness and Roadless areas. 15

13) Chapter IV: It is not possible to judge from the listing of monitoring techniques whether or not they will be sufficient to accurately judge the progress of the Plan. Although the time interval between measurements is usually given, no indication of the spatial intensity or degree of replication of measurements is provided. The Plan should discuss in detail the minimum monitoring requirements necessary to insure compliance with the Plan objectives and should provide for a minimum annual commitment of personnel and funds to accomplish this monitoring. A table listing current gaps in knowledge of Forest resources could serve as a focal point for this discussion. 16

Comments on Draft EIS

1) Pages III-4 to -7: Employment and income generated by the timber industry should be stated explicitly. Since timber harvest is a major activity of the Plan, it is worth asking whether the significance of timber to the regional economy is sufficient to justify the proposed increase in annual harvest. 17

2) Pages IV-12 to -16: Quantitative data on the effects of ORV use on vegetation cover and species composition, soil erosion, and trail condition are necessary here. Furthermore, conflicts between motorized and non-motorized users are should be given more than the lip service accorded them under "Noise." 18

3) Pages IV-34 to -39: Quantitative data should be presented on the current impacts of grazing on vegetation, wildlife forage, water quality, and soil erosion. 20

4) Pages IV-45 & -46: Quantitatitive data should be presented on the current impacts of timber harvest on soil erosion and water quality. 21

5) Pages IV-60 & -61: The same criticism applies here as for timber.

6) Pages IV-70 to -73: Again, the same criticism applies here. In addition, the loss of existing Roadless Area acreage resulting from road construction should be stated. 23

7) Page IV-87: A comparison should be made between the PNV's for each program (timber, facilities, recreation, etc.) between alternatives, as well as for total PNV. This gives the public a better idea of which Forest activities yield the greatest economic benefit (or loss). Additionally, a separate PNV analysis of the alternatives for each existing Roadless Area should be presented. 24 24a

8) Page IV-94: Changes in employment and income in each major sector of the economy should be presented in this table. 24b

9) Page IV-106: The Energy Requirements section is a valuable

Forest Service Response

128-14 The Forest Service is mandated by Congress to manage the land under a multiple use system. This means it must provide for a variety of uses. In addition, various user groups (horseback rides, backpackers, motorcyclists) desire to use some of the same areas. We must provide for these different types of use. The Plan reflects this for some areas.

128-15 Some areas within wilderness will be allowed to burn under prescriptions. See Appendix F of the Forest Plan.

128-16 As stated in Plan, Chapter IV, details of monitoring are included in documents incorporated by reference. Such documents are available for public review. Refer to response to comment 97-32a.

128-17 There was no justification for timber harvest levels in terms of employment effects in local economies. Revenues for all planned harvests exceeded costs of those harvests including road construction and reconstruction. See response to CHEC's comments on timber economics and employment effects of timber.

Between 150 and 200 sectors of local economies were included in analysis. Each of these is interrelated. Listing of all of them is impractical and breaking out the "major" ones could be misleading depending on how they were broken out and presented. Detailed economic impact analysis results are available for the public in the Supervisor's office for those interested in such information.

128-18 We fail to see the need for vegetative quantification since ORV use will be restricted to designated travel routes under all alternatives. There are few areas on the Forest where trails are open to ORV use. Proper maintenance should minimize soil erosion.

128-20 Quantitative data on grazing of vegatation are represtented by range vegetation condition classes. These were included in the FORPLAN model as condition classes and related to yield tables. The public was invited to inspect this model and yield tables in October, 1984. Representatives of the Sierra Club came in and reviewed this. Estimates of the effects can be seen by comparing AUMs of cattle and wildlife forage produced in the first decade respresenting current conditions and AUMs in the fifth decade as all range moves toward their best ecological condition. Similarily, data in the form of coeffiecient were entered in the FORPLAN as estimates of grazing impacts on soil and water resources.

128-21 There is no quantitative data (field data) collected on the Forest sufficient to indicate actual effects of timber harvest on soil and water. Such effects have been modeled with the use of state-of-the art techniques, using data extrapolated from research on other forests. The modeled effects of current timber harvest are presented as Alternative A; the first decade numbers are most appropriate regarding your comment. We caution the use of these numbers as absolutes; they should be used only for comparative purposes between alternatives over time. (See Tables IV-17 in the DEIS).

The Shoshone Water Resource Monitoring Plan, which is incorporated by reference into the Forest Plan, is designed to collect field data to determine impacts and provide a suitable guide for improving, if necessary, forest management practices.

128-23 Discussion has been added to these pages as suggested.

FPD - 128 - W - [illegible] E

addition to the DEIS.

10) Pages IV-107 to -109: The loss of Roadless Area acreage to development represents an irretrievable commitment of potential Wilderness resources. 25

11) Pages B-32 to -34. Two of the 1985 RPA benefit values used in your analysis are questionable. First, the USFS/BLM draft Grazing Fee Review and Evaluation indicates that the fair market value for cattle grazing is $7.62/AUM. Your use of a $9.09/AUM overestimates the economic value of grazing. Second, the 1985 RPA recreation values are known to have been arbitrarily reduced 37% by the Chief's office. Thus, your analysis underestimates the value of recreation. 26

12) Pages C-5 & -6: The PNV analysis of different types of timber management, including costs of building and maintaining road networks, should be shown in a separate table.

13) Appendix D: This initial attempt to place a value on oil and gas is to be commended. Many Forest Plans have ignored this process entirely.

14) Appendix F: Something new and welcome, as well.

15) Appendix G: All Forest Plans should have this section, so the public knows what options it is missing out on.

We thank you for this opportunity to comment and hope that our criticisms will prove constructive and contribute towards formulation of an improved Final Plan.

Sincerely yours,

Jeffrey R. Foster

Jeffrey R. Foster, Chair

128-24 Present Net value by major resource groups is shown in DEIS and FEIS tables II-11 and II-12. See also response to comment 128-17.

128-24a The Wyoming Wilderness Act of 1984 released all roadless areas not designated as wilderness to multiple-use management. These lands were included with other surrounding lands when multiple-use management strategies were developed and used to formulate alternatives. Often a roadless area was split by a number of analysis area boundaries and for all practical purposes does not exist as a single area that is definable. No effort was made to analyze these areas separately given the provisions of the Wyoming Wilderness Act; therefore the information on PNVs by roadless area does not exist.

128-24b The models used for analyzing economic impact contain over 40 sectors for each economic impact area. Information concerning what happens to each sector is available in the Forest Supervisor's Office in Cody as part of planning records for those interested in viewing them. Impacts of any major program on the Forest, such as recreation or timber, effect all sectors of the economy directly, indirectly or through induced effects. Tracing these out in a forestwide EIS would add much data but very little usable information. The commenter is invited to view any data in Planning Records of interest.

128-25 Discussion has been added to these pages as suggested.

128-26 See response to comments 44-7, 44-17, 139-1 and 128-8.

Comment 129

RECEIVED FPD- 129 W- L - A

THE UNIVERSITY OF WYOMING
DEPARTMENT OF GEOLOGY AND GEOPHYSICS
P.O. BOX 3006
LARAMIE, WYOMING 82071
(307) 766-3386

2 October 1985

Steve Mealey
P.O. Box 2140
Cody, Wyoming 82414

Dear Mr. Mealey:

Re: Shoshone National Forest Plan

I do not see how the plan promotes preserving an intact Greater Yellowstone Ecosystem. The wilderness buffer on the eastern border of Yellowstone National Park is not sufficient in and of it self. Additional protection of grizzly bear habitat must be included and managed uniformly as such. In the non-wilderness areas of the forest classified as grizzly habitat, there should be limited or NO logging, road building, mineral exploration, and further developed recreation development. While the plan states that there will be an effort to protect grizzly bears and their habitat, I know from personal experience that actual on-the-ground management does not reflect this attitude. I believe the plan needs to be more specific with guidelines on how grizzly bear habitat and grizzlies will be protected. 1

Along similar lines, I feel that guides and outfitters using the forest should be policed more for their compliance with the forest rules and regulations, especially in regard to wilderness and grizzly habitat. I feel that the plan should address this issue directly. 2

I encourage and support protection of the Clarks Fork River for classification as a wild and scenic river.

In reference to vegetation treatment areas, I strongly disagree with the inclusion of several areas you have included. Specifically, on the Clarks Fork District, these areas are the area near Tibbs Butte and Sawtooth Mountain, the area on and surrounding Table Mountain, the area immediately west of Clay Butte along the Muddy Creek and Ghost Creek drainages, the areas at Pilot Creek, One Mile Creek, and Squaw Creek, and the small area on Dillard Bench. 3

The fen-palsa (peat bog) along the Morrison Jeep Trail, SW of Sawtooth Mountain, should be protected, perhaps by designation as a natural area. The palsa should be mapped for permafrost and vegetation distribution Which could be done by non-forest service personal. This site is unique 4

Forest Service Response

129-1 See response to comment 42-1 and 24-1.

129-2 Outfitters and guides are managed in accordance with the Greater Yellowstone Area Outfitter Policy. This document is dynamic in that it is revised biannually by all of the administrative units in the Greater Yellowstone Area with input from the respective State Game and Fish Departments and the Outfitter Associations. Through the provisions of that document the Forest Service exercises appropriate control over that industry with regard to wilderness and grizzly bear protection.

The Forest Direction for Wilderness Management (Management Activity B02 in the blue pages) gives conditions under which a permit system can be implemented.

The Shoshone recently completed an evaluation of various tools, including permit systems, for managing all recreation in grizzly country and opted for an information and facilities program rather than a permit system.

Party size and stock limits are set in the Greater Yellowstone Area Outfitter Policy. They are relatively consistent among the various administrative units in the area and are designed to allow the traditional uses that occurred before the area was designated as wilderness to continue. Ordinarily, use that approaches the upper limit of people and livestock is by commerical parties that are required to have a permit. Through permit requirements their presence can be adequately screened from the sights and sounds of other parties in the area thus reducing impacts.

Although there are no party size and stock limits in effect outside of wilderness on the Shoshone National Forest, there is no known use by parties in excess of the limits imposed in wilderness. If this becomes a problem, the restrictions could be extended to the area outside of wilderness.

129-3 The vegetative treatment areas shown near Tibbs Butte and Sawtooth Mtn. are not timber harvest but for increased forage production for either wildlife or domestic livestock.

The timber sale near Table Mtn. has been removed from the first decade schedule. Timber sales are still planned in the Pilot Creek, One Mile Creek, and Squaw Creek area. The sales will be prepared using input from resource specialists.

Comment 129

Forest Service Response

FPD-129-W-L-A
Proj. No. 0218

Page Two
RE: Forest Plan

for its vegetation and permafrost due to its location so far south from any other palsas. I would like to see this area preserved and available for scientific research but under the control of the forest service.

Overall, I do not agree with any of the alternatives provided in the plan. I could support the preferred alternative D with modifications incorporating the items that I have discussed.

To summarize, the plan needs to include stronger protection and management guidelines for grizzly bears and their habitat. I would like stronger control of guides and outfitters using the forest. I feel that several of the vegetation treatment areas should be dropped and left as is. These areas are near Tibbs Butte, near Clay Butte, Table Mountain, Pilot Creek, One Mile Creek, Squaw Peak, and Dillard Bench. I feel that the fen-palsa, peat bog, in the Beartooths near the Morrison Jeep Trail should be preserved and protected. I strongly support your support of the Clarks Fork River for wild and scenic river status.

Thank you for including and considering these comments in your review of the Shoshone's forest plan.

Sincerely,

Beverly A. DeVore

4

129-4 Two of five areas proposed for designation as Research Natural Areas (Twin Lakes and Sawtooth) in the preferred alternative were proposed in the Beartooth Plateau Unit Plan, completed on November 26, 1980. Work necessary for designation has been underway for some time. Other RNA's may be designated in the future after the five priority areas identified in the Plan are established.

The Sawtooth peat beds area is considered unique because of its location; it is the only known area of permafrost with a peat deposit this far south in the Rocky Mountains. "Unique ecosystem" has been changed to "unique landform" on page II-85 of the Forest Plan.

We continue to work toward improving the biological inventory of forest resources, and always welcome accurate information supplied by others to help us develop this.

Comment 130

Forest Service Response

RECEIVED OCT 3 1985

FPD-130-0-L-E
Proj. No. Orig Type Addl

Wildlife Management Institute

Suite 725, 1101 14th Street, N.W., Washington, D.C. 20005 • 202/371-1808

DANIEL A. POOLE
President
L. R. JAHN
Vice-President
L. I. WILLIAMSON
Secretary
WESLEY M. DIXON, Jr.
Board Chairman

September 30, 1985

Mr. Stephen P. Mealey
Forest Supervisor
Shoshone National Forest
P.O. Box 2140
Cody, Wyoming 82414

Dear Mr. Mealey:

The Wildlife Management Institute is pleased to comment on PROPOSED LAND AND RESOURCE MANAGEMENT PLAN and DRAFT ENVIRONMENTAL IMPACT STATEMENT, SHOSHONE NATIONAL FOREST, Wyoming.

The plan is generally satisfactory for wildlife. The environmental effects are well presented and explained and are easy to understand.

The forestwide standards and guidelines are the key elements for public use of a forest plan. Those presented in the Shoshone plan are better than most we have seen. They do need two additions, however.

Winter range and riparian areas are of such overwhelming importance to wildlife that they should be included in general direction (forestwide) as well as in management areas 5A, 5B, and 9A. This will call their importance to the attention of the public and enable the average citizen user of the forest to monitor activities in those important habitat units. |1

While we generally favor Alternative "C", non-commodity emphasis, the preferred alternative contains provisions to improve most aspects of wildlife habitats and populations.

Some specific comments follow:

FOREST PLAN

Page II-42. Table II-14 is good. This is one of the few recent plans we have seen that shows existing wildlife populations and state wildlife goals.

Page II-43. The projected consumptive and nonconsumptive uses are identical throughout; please explain why. |2

Page III-6, Wildlife and fish, 1st paragraph. Add "To maintain AT LEAST |3

130-1 See General Direction, Plan pages III-69,70. The Standards and Guidelines and General Direction apply to all wildlife habitats including winter ranges and riparian areas.

130-2 We agree that nonconsumptive wildlife use probably exceeds consumptive use; however, there is no existing data to indicate what the difference is forestwide. We therefore took a conservative approach and used a 1:1 ratio.

130-3 We believe "at least" is understood and the language in the draft is clear as written. Anything less than minimum viable would not meet the definition of viability.

Comment 130

Mr. Stephen P. Mealey -2- September 30, 1985

viable populations..." Use the same language in other prescriptions, e.g., Page III-225. **3**

Page III-13 water, riparian fence construction. Building only 3.8 miles of riparian fencing a year is too slow. Let's get the job done and the riparians protected. **4**

Page III-67, #6. Add that roads may cross riparian areas, but cannot be built along them. **5**

Page III-94, #3. Seasonal closures. Add, as a reason for seasonal road closures "g. provision of quality hunting." **6**

Page III-153, 2.a., Prescription for semi-primitive, nonmotorized recreation. Why maintain only 90 percent of habitat needed for state goals? In such a prescription it should be 100 percent maintained. **7**

Page III-164. Winter range prescription. Add, "Conflicts between livestock and wildlife will be resolved in favor of wildlife." **8**

Page III-227, riparian, silvicultural. Add a statement that the only reason for timber harvest in a riparian area is to improve the riparian system. **9**

Page IV-5, the Wyoming Game and Fish Department should be an active partner in management of winter ranges. **10**

EIS

Page II-38, Alternative D. "Emphasize nonmarket values while producing commodities near current levels." Something seems wrong--these are really mutually exclusive statements. **11**

Page II-54. Explain why there is one more mile of road constructed per year in the preferred alternative than there is constructed in the commodity emphasis alternative. **12**

Page II-64. There is very little cost benefit difference between the preferred alternative and noncommodity emphasis alternative (only $3 million over a 50 year period). Therefore noncommodity should be selected. **13**

These remarks have been coordinated with William B. Morse, the Institute's Western Representative.

Sincerely,

Daniel A. Poole
President

DAP:slh

Forest Service Response

130-4 Riparian fence construction as a forest practice is one which does not meet universal approval. It is therefore practical to implement the practice by phases, after priority sites have been identified. The expense of fence construction argues for this approach, so that a balanced program can be maintained during these times of limited budgets. Emphasis on other means for maintaining riparian habitat must be relied upon in the interim.

130-5 Please refer to direction for Management Area 9A, Chapter III of the Plan, which deals with all nonwilderness riparian areas. General Direction and Standards and Guidelines under Transportation System Management addresses this concern.

130-6 The ROS classification for any given area determines the quality of the recreation experienced; however, if the Forest in cooperation with the Wyoming Game and Fish Department agree to a closure for quality hunting, the roads could be seasonally closed under 3E and 3F, Page III-94 of the Proposed Plan.

130-7 See response to comment 97-27, particulary last sentence.

130-8 See paragraph #2 page III-158 of the Plan. It is implicit that this is the intent (resolved in favor of wildlife).

130-9 Direction is provided in the Plan, both in the blue pages and in the yellow (see management prescription area 9A, Chapter III of the Plan, to clarify this point).

130-10 We agree. See footnote on page IV-9 of the proposed Plan.

130-11 The Forest Service could possibly be indifferent or even ignore noncommodity values while keeping commodity production at near current levels. Or with increased budget, we could increase our efforts in both the commodity and noncommodity areas. The Forest Service does not believe the statements are mutually exclusive.

130-12 In response to numerous concerns, the number of acres managed for timber harvest and the resultant amount of roads has been reduced in the final Plan. In the next fifty years, the Plan projects only eighty miles of new road which will be open to the public. There is projected 120 miles of existing road which will be improved and remain open to the public. An additional 150 miles of new road, and 255 miles of reconstructed existing roads are projected to be closed to the public within the 50 year period. Road construction and reconstruction figures have been corrected. See also response to comments 182-5, 33-9, 80-5, and 44-46.

130-13 An alternative is not selected on the basis of cost benefit alone. In DEIS and FEIS tables II-9 one can see the benefit/cost ratio of each alternative. Alternatives are analyzed for outputs, costs, and effects, including economic effects and a selection made which has the most desirable combination. See also response to comment 132-4.

Comment 131

Forest Service Response

RECEIVED OCT 3 1985

FPD-131-F-L-C
Proj No. Orig Type Appl

October 2, 1985

To: Stephen P. Mealey, Forest Supervisor
Shoshone National Forest
P.O. Box 2140
225 West Yellowstone Avenue
Cody, Wyoming 82414
Re: Shoshone Forest draft plan comment

As a concerned citizen and Shoshone Forest user, I submit the following comments for your consideration.

I feel wildlife and nonmotorized recreation are the most important resources the Shoshone Forest offers. High air and water quality standards should be maintained. I would like to see the Clark's Fork become Wyoming's first Wild and Scenic River. I support the increased restrictions on mineral activity. It is important to get the grizzly bear off of the threatened species list as quickly as possible.

I do not wish to see anymore road construction on the Shoshone Forest. Many roads are in need of maintenance. 1

I support small logging operations like the Wilson mill in Dubois, the Yetter mill near Meeteetse and the Scott mill at Grass Creek, but I do not favor the size of operation like the L.P. mill in Dubois that requires logging on a scale so large it jeopardizes other resources. 2

I do not want to see any more cattle or sheep allowed above the present numbers. Many permit holders are doing an excellent and conscientious job on their allotments. I feel the Forest Service should concentrate its efforts on those permit holders who do not. Grazing on public land is a privilege and not a right. 3

I strongly believe no new outfitter/guide camp permits should be issued. 4
The situation in the upper Dry Creek drainage where I have a standing outfitter/guide camp permit application, has changed in recent years because of an increase of use by outfitters and residents. 5

I feel there is merit in the idea of a recreational user fee if it would provide better management, road mantenance, and wildlife user opportunities. 6

Sincerely,
Tory Taylor
Tory Taylor
Spring Ranch
Dubois, Wyoming

131-1 In response to numerous concerns, the number of acres managed for timber harvest and the resultant amount of roads has been reduced in the final Plan. In the next fifty years, the Plan projects only eighty miles of new road which will be open to the public. There is projected 120 miles of existing road which will be improved and remain open to the public. An additional 150 miles of new road, and 255 miles of reconstructed existing roads are projected to be closed to the public within the 50 year period. Road construction and reconstruction figures have been corrected. See also response to comments 182-5, 33-9, 80-5, and 44-46.

131-2 As mentioned in other responses, timber harvest levels have been set according to biological and economic factors. When the Forest Service sells timber, the purchaser is determined through competitive bidding processes. See also response to comment 51-5.

131-3 Allocations between cattle and wildlife are based on available forage and wildlife objectives. Efforts will be concentrated on problem allotments.

131-4 The public response to the proposed new outfitter/guide camps has been overwhelmingly negative. Therefore, no new outfitter/guide camps are allocated in the Forest Plan.

131-5 The Plan identifies a potential outfitter/guide camp near Moose Lake in Dry Creek. We believe this can be a viable operation. The camp in Meadow Creek is not identified because it does not meet the criteria for a large group camp as shown in EIS, Appendix H. The camp at Moose Lake will replace the existing Meadow Creek Camp.

131-6 The assessment of fees for dispersed use of National Forest lands requires legislation and is therefore beyond the scope of this Plan.

Comment 132

Forest Service Response

RECEIVED OCT 3 1985

FPD-13a F-4-C
Proj. No. Orig Type Affil

Rachel L. Larson
P.O. Box 412
Dubois, WY 82513
Oct. 1, 1985

Stephen P. Mealey,
Forest Supervisor
Shoshone National Forest
225 West Yellowstone Ave.
Cody, Wyoming 82414

Dear Mr. Mealey:

I'm glad to have this opportunity to share my concerns with you regarding the future of the Shoshone National Forest. The issues involved are highly controversial, and I urge you to take the difficult steps necessary to preserve the Forest in a condition equal to or better than its present state. You are, no doubt, under heavy pressure from various factions to do otherwise.

Dubois is deeply split regarding the Forest Service's effect on the local LP mill. Many people insist on letting LP call the shots on the amount of timber harvested, without much regard for long term environmental effects. I believe this faith in LP is misplaced. Other LP mills in various parts of the country, even places with more and bigger timber which are better suited to logging, are slowing and closing down due to the economics of the time. This local mill may not last much longer, either, regardless of a Forest Service attempt to save it. Perhaps then the smaller logging companies could expand, and relieve some of the unemployment problems.

There is little or no evidence that logging, and the accompaning road systems benefits wildlife populations, and it is apparent that fisheries suffer from such activity due to increased silting. Definitely, tourism suffers as scenery is marred by networks of logging roads and clearcuts. I believe that as our country grows more urbanized and populated, the demand for liesure and recreation in an unspoiled, vast, quiet mountain forest will multiply. If we rush in and develop and log remaining roadless areas (for a few people's short-term economic gain) we will be cheating ourselves and future generations out of a more viable economic future in tourism-related fields. 1a

In view of these concerns, I feel that more emphasis should be placed on the recreational potential of the Shoshone. Trails should be properly maintained by an adequate number of workers, which is not the case at present. More Wilderness Guards should be patroling the backcountry, to educate people regarding low-impact camping, to help clean up areas that have been abused, and to fine the polluters. Campgrounds and other facilities should be adequately maintained. 1

132-1a In the 1984 Wyoming Wilderness Act, Congress directed that nonselected roadless areas be released for multiple use purposes, and that "buffer areas" were not to be considered adjacent to Wilderness. With this legal direction in mind, some timber sales and the accompanying roads have been scheduled in roadless areas, while other currently roadless areas have not been scheduled. See also response to comments 182-5 and 44-46.

132-1 The Forest Service recognizes the need for additional emphasis on trail construction and maintenance, and wilderness dispersed camping site reclamation. Implementation of the Plan would provide for this additional emphasis.

Currently, Congress disperses money to the forests by appropriation. This means there are separate monies for trails, roads, dispersed recreation. By law, the Forest Service cannot use money appropriated for one function, to do work in another. Thus, road money cannot be diverted to trail work.

Comment 132

Forest Service Response

FPD-132-F-L-C
Proj. No. Orig Type Alt.

Enough feed for pack animals should be preserved in the backcountry. This is currently a problem in some areas, due to overgrazing by cattle, and improper supervision of cattle. I strongly urge you to reduce the number of cattle on the Forest. This would help insure a safe future for hunting and outfitting, as well as enhancing the scenic value and wildlife habitat. 2

Some re-allocation of funds would be necessary and beneficial, in order to shift the emphasis away from the predominant timber and range, and toward the more far-sighted policies which would promote recreation in our area. 3

Alternative C in the proposed plan answers these concerns better than your preferred Alt. D. For this reason I urge you to adopt an option similar to C, but please consider making the necessary adjustments which I have mentioned. 4

Thank you very much.

Sincerely,

Rachel L. Larson

132-2 In most areas of the Forest where there are established outfitter camps, there is no term permitted livestock grazing. In areas of permitted dual use, utilization will be monitored to provide forage for both uses.

132-3 While the preferred Alternative, D, does not place as much emphasis on recreation as Alternative C, it does provide for a shifting of funds from timber and range to recreation from the current situation, which is addressed under Alternative A.

132-4 Based on all analysis, the Forest Service believes that Alternative D presents a more balanced mix of Forest uses than Alternative C. Alternative D as a whole responds better to the issues and concerns identified.

Comment 133

Forest Service Response

RECEIVED OCT 3 1985

FPD-133 F- L C
Proj. No. Orig Type Area

John Preston
PO Box 186
Dubois, WY 82513
Oct. 1, 1985

Mr. Steve Mealey,
Forest Supervisor
Shoshone National Forest
225 West Yellowstone Ave.
Cody, Wyoming 82414

Dear Steve Mealey:

I would like to share with you some comments and concerns I have on the Shoshone Forest Plan. Because of my familiarity with the Dubois area, my comments are based primarily on what the Plan proposes for the Wind River Ranger District. However, I believe that my concerns and comments do apply to the Forest as a whole and should be taken as such.

I will begin by saying that I prefer Alternative C to the proposed Alternative D. I feel that C provides the best direction for the future of the Shoshone and I encourage the Forest Service to adopt it rather than D. Although both alternatives are described as emphasising production of non-commodity resources they differ in their treatment of domestic livestock and timber production. I favor decreased levels of domestic livestock and timber production rather than current or increased levels. 1

Throughout the Plan Detail Prescriptions the statement that "...range is managed to produce moderate amounts of forage while sustaining or improving range quality to a fair or better condition" is often repeated. I question if some of the range on the Forest is currently in a "fair or better condition". I have seen areas of the forest where overgrazing has occurred and I cannot imagine an increase in grazing capacities when perhaps the capacity has already been exceeded. I oppose a 33% increase above current permitted numbers by the end of the planning horizon as called for in alternative D. I feel it is wrong when recreational users, particularly during hunting season, cannot find adequate feed for their stock because the area has been overgrazed by cows.[I do not want to see the "Horse Forest" become the "Cow Forest".] I oppose the idea of converting unused sheep allotments to cattle grazing. The sheep allotments that I am familiar with are at a high elevation and are better suited to use by wildlife than by domestic cattle. 2 3

I question if the Shoshone can maintain current levels of timber production for very long as called for in Alternative D In order to sustain this level of timbering, roads must be built into such areas as the Donoir and Ramshorn Basin area. I believe these areas would be better left unroaded. These roadless areas should either become additions to the Washakie Wilderness or remain as unroaded "buffer zones" to the wilderness. I do not oppose logging on the Shoshone, but do not feel 4

133-1 Based on all analysis, the Forest Service believes that Alternative D presents a more balanced mix of Forest uses than Alternative C. Alternative D as a whole responds better to the issues and concerns identified.

133-2 Some of the range is not in the "fair" condition at this time. However, the statement reads that they will be improved to a fair or better conditon. The increased forage would be allocated to both cattle and wildlife.

133-3 Should a conversion from sheep to cattle be proposed, implementation would only be done after an analysis shous that the range is suitable for conversion to cattle.

133-4 In the 1984 Wyoming Wilderness Act, Congress directed that nonselected roadless areas be released for multiple use purposes, and that "buffer areas" were not to be considered adjacent to Wilderness. With this legal direction in mind, some timber sales and the accompanying roads have been scheduled in roadless areas, while other currently roadless areas have not been scheduled. See also response to comments 182-5 and 44-46.

Comment 133

Forest Service Response

EPD - 133 - F - L - C
Proj. No. Orig Ty. Ad.

there is a need for large cuts in roadless areas. In the Dubois area there is a need for small logging and mill operations but not for an operation the size of the Louisiana-Pacific mill that presently operates. Then the L.P.mill shuts down, which I believe it will in a few years, will there be a need for the large timber sales that the Plan calls for? I do not feel that the economic future of the Dubois area lies eith the L.P.mill, and I don't want the Shoshone to feel pressure to sustain L.P. by providing it with massive amounts of timber. Without the need to meet large timber targets there will be less inclination to cut timber in critical wildlife habitat areas such as the Dunoir. Although I favor Alternative C, I feel that it proposes too many miles of new road construction or reconstruction, and I would favor this number (206 miles) being considerably lowered.

4

5

133-5 As mentioned in other responses, timber harvest levels have been set according to biological and economic factors. When the Forest Service sells timber, the purchaser is determined through competitive bidding processes. See also response to comment 51-5.

I strongly oppose any oil and gas leasing or timber sales in grizzly bear habitat. I support the Plan's recommendation to withdraw all wilderness and critical grizzly bear habitat from oil and gas development.

6

133-6 See response to comments 68-8 and 51-3.

I would like to see the Shoshone Plan and budgets reflect the importance of recreation and wildlife in this area. In Chapter II, page 29, the Plan states that in "FY 1982 recreation funds comprised only 12.7% of the total Forest budget." On the same page the Plan states that conditions for wilderness, dispersed and developed recreation are sometimes below regional standards. On page 40 of the same chapter it is stated that "Field personnel and financeng have not been abailable to manage the wilderness properly...jobs have not been performed to the required standards." It is essential that the accepted Plan emphasises the allocation of funds to properly provide and maintain recreational facilities. The numbers of people working in trail maintenance and wilderness management on the Wind River District has decreased drastically in the past five years. It does the Forest Service little good to improve access, as in the Wolf Creek Road upgrading, but yet not have adequate funds or personnel to improve the Wolf Creek Trail or do backcountry patrol work.

7

133-7 Funding requirements for all activities of the selected alternative will be built into annual budget requests for the agency. Totat funding available for any given activity, however, is dependent upon action taken by the Congress in the appropriation process.

I favor Wild and Scenic River status for the Clarks Fork River and encourage the Shoshone to support this action.

8

133-8 The Proposed Plan incorrectly states that we can apply for an extension of the protection period for the River. It is contingent upon an act of Congress to protect the River either by including it in the Wild and Scenic River System or by providing additional temporary protection. It is uncertain at this point whether the Clarks Fork of the Yellowstone River will become a part of the National Wild and Scenic Rivers system. The Forest Service and the Administration are in favor of the River's inclusion. Management activities that are within the discretion of the Forest Service will be designed to maintain the River's eligibility. Other activities that are presently within the discretion of agencies such as BLM (minerals) or Federal Energy Regulatory Commission (hydropower development) could affect eligibility characteristics of the Clarks Fork. In the event such developments are proposed, we would recommend denial to the appropriate agency, until Congress acts. See also response to comment 97-1a.

It should be obvious from the above comments that I believe the Shoshone should place emphases on wilderness/recreation and wildlife rather than grazing, timgering, or oil and gas development. I favor the concept of a greater Yellowstone ecosystem and feel that the Shoshone is a key component in this remarkable ecosystem, and its Management Plan should reflect this.

Sincerely,

John Preston

John Preston

Comment 134

Forest Service Response

RECEIVED OCT 3 1985

FPD-134-F-L-E
Proj. No. Orig. Type Appl

DUBOIS WILDLIFE ASSOCIATION

BOX 1112 DUBOIS, WY 82513

OCTOBER 1, 1985

Mr. Stephen P. Mealey, Forest Supervisor
SHOSHONE NATIONAL FOREST
P.O. Box 2140
Cody, Wyoming 82414

Dear Mr. Mealey:

The Dubois Wildlife Association is an alliance of local citizens principally concerned with preserving Wyoming's abundant and diverse wildlife. Recognizing the mutual benefit of sound environmental stewardship to both the natural vitality and variety of human endeavors, the association strives to serve as a collective voice in all issues affecting wildlife, game and non-game alike.

The association works toward implementation of its goals defined by its members as protection of wildlife and critical habitat, roadless areas that are important for recreation and wildlife, and fisheries in the upper Wind River Valley.

The Dubois Wildlife Association serves as a source of information and ideas enabling its members and the public to make sound decisions regarding our natural resources. We want development done right--the first time.

Our general uniting concern is for the sufficient care and adequate maintenance of Wyoming's superb wildlife and habitat, precious water resources, rich farmlands and rangelands, the importance of agriculture to our state's heritage and economy; and our special way of life centering on outdoor activities, hunting and fishing, and economic pursuits dependent upon the land. In addition, our members share a profound sensitivity to the needs of non-game wildlife as well.

It is indeed difficult for a small and diverse group such as ours to arrive at a general consensus for comment on the forest plan. However, as part of our philosophy to help provide information to the public to enable them to formulate decisions on important issues, we co-sponsored a forest planning workshop on August 28. The turnout was encouraging for Dubois. Some twenty or more individuals, representing a cross-section of environmental, middle-of-the-road, ranching, and timber interests were in attendance; and asked good, sound issue-oriented questions.

No response necessary

Comment 134

Forest Service Response

FPD-134-F-L-E

DUBOIS WILDLIFE ASSOCIATION
BOX 1112 DUBOIS, WY 82513

No one alternative or combination of alternatives is able to satisfy all the members of our association. Therefore, we respectfully request that concerns of the following individuals, who made personal comments or who worked on organizational comments; and who are members of the Dubois Wildlife Association, be considered as collectively representing our association's philosophy. 1

Duane Howe--Personal
Michael Kenney--Personal
Tory Taylor--Wyoming Wildlife Federation
Meredith Taylor--Greater Yellowstone Coalition
Gary Rice--Dubois Outfitters Association
Reg Phillips--Manager: Diamond D Ranch
Bruce Thompson--Personal
Kay Bowles--Wyoming Game and Fish
Scott Benson--Wyoming Game and Fish

The Dubois Wildlife Association recognizes the work you and your planning staff have done in trying to formulate a workable plan for the SHOSHONE over the next fifty years. As individuals and as members of various concerned organizations, we welcome the chance to participate in the public comment process.

Thank you,

The Dubois Wildlife Association

134-1 See responses to individual commentors.

Comment 135

Forest Service Response

Wyoming State Legislature

[illegible], Cheyenne, Wyoming 82002, Telephone 307/777-7881

FPD - 135 - F - L - G
Proj. No. Or. [illegible]

RECEIVED OCT 3 1985

REPRESENTATIVE BOB BAKER
Fremont County
P.O. Box 282
Dubois, Wyoming 82513
Committees:
Travel, Recreation and Wildlife
Commerce and Business

October 1, 1985

Mr. Stephen P. Mealey, Forest Supervisor
Shoshone National Forest
P.O. Box 2140
Cody, WY. 82414

Dear Steve,

My letter here is to give support for oil and gas leasing in the new forest plan. Your forest has within the last several years generated two EIS's demonstrating that this type of use can be made of forest lands, including wilderness, without serious harm to the land, vegetation or wildlife. I realize that the so called "public input" did not want development in wilderness areas but it was the intent of the Wyoming Wilderness legislation of 1984 to release all other lands to multiple use and possible development. The opponents of development and proponents of wilderness can't have it both ways!

Some projections indicate that our nations supply of oil will shrink drastically within as few as nine years. Other projections indicate that oil will supply 35% of our countries energy needs even a decade from now. To allow ourselves to become overly dependent upon the middle east for our oil is asking for major economic problems. Here in Wyoming the mineral and energy business generate 68% of the money to run state government. Someone is going to have to pay the bills both here in Wyoming and at the federal level and that someone is likely to be oil and gas. Leasing public lands for exploration makes good sense. Lets worry about what will be required to restore the land at the time sufficient oil is found to be developed instead of reacting to some percieved problem by those people who are already unwilling to share the land and its resources.

The new Shoshone Forest Plan should allow for oil and gas leasing on as much non wilderness land as is reasonably possible. I believe that it is the forest managers job to determine how the job can be done and to optimize the resources from the land rather than determining how to limite use of the land. That is a big responsibility, but the job won't get done until the forest service takes that responsibility. I appreciate your considering my comments.

Sincerely yours,

Bob Baker

Bob Baker

135-1 We have a clear mandate to apply multiple use principals to lands not included in wilderness. The Forest Plan, Alternative D was perferred in a large part because it allows minerals activities while recognizing and maintaining the other resource values that are important to many forest users. This will, however, require that we recommend stipulations and operating procedures to oil and gas activities that insure other resource values and objectives are met. See also response to comment 68-5.

Comment 136

TABLE MOUNTAIN RANCH . . . Route 63, Box 105. . . Lander, Wyo. 82520

RECEIVED . . . 3 1985

September 29, 1985

Mr. Stephen P. Mealey, Forest Supervisor
Shoshone National Forest
PO Box 2140
Cody, Wyoming 82414

FPO - 136 - F - L - E
Proj. No. Orig Typo Appl

Dear Mr. Mealey:

The enclosed comments have been prepared regarding the proposed management plan for the Shoshone National Forest. The comments were developed through personal observation, discussions with Forest Service personnel, and discussions with forest users, as well as study of the voluminous documents published by the Forest Service. Thank you for the opportunity to comment.

Cordially,

Dave Raynolds

Dave Raynolds, Chairman
Natural & Environmental Resources
Committee
Wyoming Farm Bureau Federation

SUMMARY OF FINDINGS AND COMMENTS

The plan is skewed, as if Shoshone were a Park, not a Forest, and the job preservation instead of management and conservation. Multiple use concepts are slighted, with over 85% of the acreage devoted to recreational use only. 1

Costs are high at over $4.6 million, though planning itself was a major expense in recent years. 2

Destructive forces are only partially addressed: there is a good fire plan, but more needs to be done to curb pine bark beetle, giardia, and perhaps acid rain. 3

Present fee sources seem negledted in the plan, particularly grazing and timbering. 4

Plans for many more rights-of-way should be re-examined. There may be an opportunity to have Park and Fremont counties contribute nominal amounts ($1 per tourist-user-month) for non-fee-paying recreational users; this would engage both users and residents in concern for the forest. 5 6

Shoshone was our first national forest. Let's try to make it one of the best.

Forest Service Response

See the following pages for responses to each numbered point.

SHOSHONE NATIONAL FOREST: July 1985 Plan September 29, 1985

Findings and Comments: FPO-136- F - L - E
Prog. No. Off. Type Area

1. Multiple Use Concepts are Slighted: The Plan reads almost as if Shoshone were a Park, not a Forest. Park workers have a single, preservationist task, and concessionaires handle the paying crowds. Forest management is much more complicated, if multiple use prevails. In Shoshone, over 85% of acreage is already committed to the single recreactional use (grazing less than 12%, timbering 4% per century, minerals less than 1%). The study estimates 1 million visitor days; this appears to include non-destination travellers using paved highways through the Forest to get somewhere else. The plan's thrust seems to be away from multiple use (including offsetting fee receipts) toward unpaid recreational use. This is a prodigal approach to natural resources. If the objective were to get Shoshone National Park, then turn management over to the National Park Service and the TWA concession.

2. Costs are High: Preferred Alternative D posits continued high costs of $4.6 million per year in 1982 dollars. No detailed figures are shown. Since costs in 1985 and before were severely impacted by these huge studies, savings of at least 10% could be effected without hurting resource management. Reduced costs and increased fees would make for a better forest.

3. Destructive Forces only Partially Addressed: Some areas of concern are mentioned, others avoided.

a. Fire: The plan has an innovative fire approach which could result in reduced costs and improved habitat. This innovation should be recognized, commended, and tested.

b. Timber Problems: Pests, particularly pine bark beetle, are destroying large parts of the forest due to (a) lax timber management and (b) too-strict fire control. The new fire plan would help, but selective additional small-scale timbering is needed to limit damage. There is now substantial risk of a fire storm from South Pass to Cody.

Forest Service Response

136-1 The Shoshone National Forest is 57 percent wilderness. The Wyoming Wilderness Act of 1984 specifically mentions release of lands not designated as wilderness for multiple use, specifically condemns the concept of nonwilderness buffers around designated wilderness, and states that lands not designated as wilderness need not be managed to preserve wilderness character. Many of the nonwilderness areas are protected from development because of being critical for wildlife, unproductive for wood fiber production, or critical for visual corridors. Regardless of entry into a few of the many remaining roadless areas, the Forest will remain overwhelmingly unroaded and more or less undeveloped. Our charter is to manage for multiple-use, not just preservation.

The uses of the Forest other than preservation and nonmotorized recreation, such as wood fiber production, domestic livestock production, oil and gas development, developed recreation, and motorized recreation, have been provided for to the extent possible given a stewardship objective. The Forest Service feels that these more commodity-oriented uses have been provided for in balance with the noncommodity uses in the preferred alternative.

136-2 Costs for activities funded under any alternative of the plan are derived from historical unit costs for that activity. At a total cost of $4.6 million, the Shoshone, although the 12th largest forest in the National Forest System remains the Forest with the second smallest budget in the Rocky Mountain Region.

136-3 We do not believe that Giardia is transmitted by recreational users alone. Use of the Forest by a number of different user groups has grown, and along with increased use Giardia as a problem has become evident. The transmission cycle includes wildlife (especially beavers) and domestic animals (dogs) taken by various users into the backcountry. The Forest promotes literature on Giardia, wilderness and backcountry sanitation practices, and water treatment for consumption. Elimination of the disease would entail much restricted use or elimination of use of public lands. This is not practical, desireable, or legal.

Acid rain, generically described as air pollution, has been identified as a potential problem in the sensitive wilderness ecosystems of the Forest. Please see the EIS in Chapter III under Air and in Chapter IV under Minerals, Environmental Effects on Air.

Also see response to comment 41-6.

Shoshone National Forest FPD- 136 F - L - E
Proj. No. Orig Type Area -3-

c. Giardia: This intestinal parasite is spreading through the forest, transmitted by recreational users. It was not prevalent for the first 50 years of forest use by herdsmen, timberers, geologists, etc. A major effort is needed to (a) educate recreational users against contaminating lakes and streams (b) eliminating the disease from contaminated areas.

d. Acid Rain: This may turn out to be a problem as studies go forward, and could be identified now as a problem of concern.

4. Present Fee Sources Neglected: With the thrust of the plan going to non-paid recreational uses, present fee sources were neglected. A more positive approach would be to encourage present fee users, and lay plans for eventual fee recognition of recreational use.

a. Grazing: Carrying capacity will likely increase under the proposed approach to fire. The suggestion that cattle and horse grazing is more viable than sheep grazing is probably accurate. It is surprising that the amount of land susceptible to grazing varies little from plans A to P. Present expenditures in all national forests for range improvement amount to about 5 cents per acre per year, less than t he grazing fee receipts. There should be a way to use full grazing receipts in a way that grazing resources either intensify on the present small land base, or bring in additional land as suitable for grazing. Improved forage conditions would also assist wild animals and birds.

b. Timbering: The forest publicized the fact that it makes money from timbering in September press releases; however the plan alternatives reduce timbering. The cut should be increased to (a) check pine bark beetle and other infestations, and (b) increase fee receipts while making more timber available on the market and thereby curbing costs to consumers. Unfortunately, the combined reductions of sales in Shoshone and Bridger-Teton may drive out the major company.

3

4 136-4 Sources of fees are moneys received from timber harvesting, grazing of domestic livestock, recreation fees, and fees from special use permits such as lodges and outfitters and guides. These fees were included in analysis of alternatives as discussed in the economic efficiency discussions in Chapters II and IV of the EIS as well as in Appendix B of the EIS. Their impact in terms of economic efficiency and ranking of alternatives is discussed in Chapters II and IV and displayed in Tables II-10 and II-11. See also response to comment 75-4 and Appendix K of the Plan.

Shoshone National Forest

An effort should be made to see if beetle-control cutting could produce firewood for urban centers in Wyoming and Colorado.

c. Oil and Gas: This may prove to be of declining impact. However cumbersome regulation has not made exploration easy in the non-wilderness parts of the forest.

d. Minerals: Following closure of the Atlantic City mine, there does not appear to be much mineral activity in or near the forest. Care should be taken that the loosely-defined "grizzly bear habitat" concept not be used to preclude mineral activity on present or future claims.

e. Schools and Guiding: By now the National Outdoor Leadership School (NOLS) has a better grasp of the Wind River and Absaroka parts of the forest than the Forest Service, since they are not so chair-bound. Expansion of the NOLS activity should be encouraged. Guide operations should also be encouraged.

5. Non-fee Activities: The bulk of forest expenditures appear to be made for the benefit of non-fee payers, though there is little evidence of this on the ground in the forest itself.

a. Rights of Way: The plan discusses many instances where new rights-of-way are sought. This might prove both costly and counter-productive. As additional road and trail heads are constructed, they may require additional county roads in Fremont and Park counties to reach them. It would be cheaper, and perhaps more sensible in a personal security sense, to limit the easily-accessible gateways to the forest. Limited gateways would concentrate people-caused forest fire risk, giardia risk and risk of lost or injured tourists.

b. User fees? An estimated 1 million user days would imply about 30,000 tourist user months. Perhaps the bordering counties (Park, Fremont) could contribute $1 per T.U.M. to forest management, in turn drawing funds from tourist facilities (motels, etc.).

4

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6

136-5 The needs for rights-of-ways throughout the Forest were carefully evaluated and only those specifically needed for public or administrative access were identified for acquisition. It is not appropriate to use lack of access rights to limit numbers of forest visitors. To do so would limit access to those privileged few who happen to be able to secure permission to cross privately-owned property bordering the Forest. Jurisdiction over roads, be it County, Forest Service, or other entity is determined by the primary use of the road. If a road serves mostly private land, it should probably be under county jurisdiction. If it serves mostly National Forest purposes, it should be maintained by the United States. In some cases, both should share the responsibility.

136-6 The assessment of fees for dispersed use of National Forest lands requires legislation and is therefore beyond the scope of this Plan.

Comment 137

Forest Service Response

RECEIVED ... 3 [illegible]

FPD-137-0-L-B
Proj. No. Orig Type Alpha

PHILLIPS PETROLEUM COMPANY
DENVER, COLORADO 80237
8055 EAST TUFTS AVENUE PARKWAY

October 2, 1985

Re: Shoshone National Forest
DEIS and Plan

Stephen P. Mealey
Forest Supervisor
Shoshone National Forest
P. O. Box 2140
Cody, WY 82144

Supervisor Mealey:

This opportunity to provide comment regarding the Shoshone National Forest Draft Environmental Impact Statement and Draft Plan is appreciated. It has been our concern, as evidenced in earlier communication, that oil and gas as resources within the forest receive equitable emphasis within these planning efforts. It is felt that the Plan and EIS should reflect, as nearly as is possible, a realistic and equitable treatment of oil and gas related activities within the forest, and toward that end the following comments address such efforts within these documents.

It is of some concern that early within the DEIS that "long term adverse consequences," disruption of "visual and aesthetic qualities," and "a wide range of impacts on aquatic ecosystems and water quality" are so characterized as resulting from oil and gas related activities that the ensuing conclusion is that "at issue is the relative importance of surface resource values and qualities, aesthetics and energy supplied." To so emphasize with such conclusive characterization presumes incompatibility in kind and degree, denying that compatibility can exist from efforts of prudent operators within the oil and gas industry. To offer such comment so early within detailed and lengthy documents is premature. A further concern in this regard is the reference as a "disruptive issue" of oil and gas related activities with "polarization" ensuing. These conclusions, whether included immediately upon commencement of the document to be illustrative of a prefacing assumption for which the conclusion is intended to be drawn later, or for whatever inferences such effort is intended to cause, any later discussion that should fairly address the compatibility of industry efforts with surface resource concerns is surely made more difficult. It is unfortunate that with planning efforts as 1

137-1 We agree that it would not be proper to "emphasize such conclusive characterization" of the effects of oil and gas activities early in the doucment or to present oil and gas and gas production as being hopelessly incompatible with surface resource values. We assume that this comment arises from the text of planning problem statement #11 found in Chapter I of the EIS. In this section of the document we have tried to convey the concerns of different segments of the public. There was no attempt to pass judgement on particular concerns as to validity. We tried to remain entirely neutral and merely present concerns as solicited from the public. We believe that planning problem statement #11 as written is true to a neutrality position and does not imply any judgement on the validity of concerns expressed.

FPD-137-0-1-B
Proj. No. Orig Type Trial

Stephen P. Mealey,
Forest Supervisor
October 2, 1985
Page Two

technically innovative in some ways as these would seem to be, recognition beyond prematurely drawn conclusions and related attitudes could not be maintained consistently toward deriving a genuinely fair representation for the resources of oil and gas. Indeed, it may well be that with using advanced technique in planning an increased responsibility commensurate to any improvement in these efforts should be expected to discourage earlier shortcomings within some planning efforts. **1**

Concern continues with statements which further recite those attitudes gotten through a dubious means for achieving substantive consideration of the subject matter by tabulating as though by "ballot" for viewpoints regarding some of the "issues" while other contributed comment of a substantive nature may in comparison be ignored in being made on a singular basis in comparison to the taking of "polls." This would not seem to really encourage fulfillment of the NEPA process. Rather than recognition of an "issue" by numbers, it surely seems more the intent for consideration of the matter on the basis of the content of the comment, regardless of it being made by one or many. In this instance, actual constituencies for the focus of these planning efforts exceed in scope the emphasis of the statements from the DEIS referenced above. **6**

137-6 See response to comment 68-1.

As is noted, site-specific concerns are considered with operating plans filed by operators, and "appropriate mitigation measures" utilized for protection of surface resources. Even so, within this Plan no allowance has been made for travel corridors by any designation while helicopter usage seems largely to be the suggested means for circumventing the building roads. In many instances this may not be required, but the Plan lacks consideration of less severe stipulation for such cases, thereby failing to consider less restrictive measures before resorting to the more restrictive. It seems more equitable and consistent with actual needs to allow for waiver of copter utilization in those instances when not really required by the site-specific situations. As noted in the DEIS, reduced road use is a concern for wildlife management which is readily accommodated with the closely self-monitoring efforts from prudent operators in cooperation with the involved agencies. Once the temporary drilling operations related to exploration cease, roads built for such efforts can remain closed or can be reclaimed. **2**

137-2 See response to comment 68-6.

Within wildlife concerns, the exclusive denial of oil and gas related activities within Grizzly Bear 1 Habitat seemingly denies recognition of the oil and gas industry's activities when so designed for being compatible with responsible concern for the bear. This may, in effect, constitute a withdrawal of lands under FLPMA , requiring further agency efforts for modification or reporting of it as a withdrawal. With evaluation more difficult for oil and gas, when compared to those values ascertainable for the more easily determinable surface resources, much scrutiny, it seems, should be exercised in pursuing a means for **3**

137-3 See response to comment 68-8.

best copy available

Comment 137

FPD - 137 - 0 - L - B
Proj. No. Orig. Ltr.

Stephen P. Mealey,
Forest Supervisor
October 2, 1985
Page Three

comparison of benefits to be derived from allocation of various resource priorities by alternative. To this extent, estimated lease bid values do not reflect the lost potential of oil and gas when no opportunity is allowed for access. 3

As has been noted in the DEIS, potential exists for oil and gas in various areas within the forest as further established by fields offsetting the forest. In this connection, with these estimates, the appraisal is made that "the minerals resources most likely to exert environment effects on the forest during the planning horizon are the leaseable, namely oil and gas." With this conclusive statement, concern is to be felt for the overall validity of earlier precepts that apparently contributed to this conclusion, fearing that any scenarios involved might have been allowed exaggeration. Within the alternatives, activities associated with oil and gas exploration and development are to be constrained, subject to the parameters established for maintenance of the "minimum acceptable standards" for surface resources. This is accomplished with the utilization of prescriptions as set forth in Appendix J, and this enhances understanding this portion of the process. However, oil and gas should receive the same consistent level of concern for representation as the other resources through the nonwilderness areas. This point is made realizing that the expressed constraint of compliance for oil and gas related activites with standards intended to protect, preserve and possibly enhance the other resources is not designed to provide a reciprocal concern for the effect of surface resources' related activities upon access for oil and gas exploration. This emphasis is clearly portrayed within the "Preferred Alternative" with its "more stringent recommended operating plans." 4

This emphasis in favor of surface resources is depicted well in the "Preferred Alternative" with the declining value from the present management emphasis for the lease value for the decade. This portrayal obviously represents relative values and may be somewhat inaccurate but, nevertheless, the trend to lessen emphasis from the current level for these values related to oil and gas provides an alarming disclaimer to any expressions of having a genuine or equitable regard for oil and gas resources within the forest. Serious questions exist as to the degree of effort exercised within these planning efforts toward prioritizing or trading off one resource over another as through the prescriptions even as they are characterized as "mini plans." If this has not been tried sufficiently with the information available to accomplish a genuine comparison of resources for management emphasis, a question of compliance with the National Forest Management Act is to be considered. The failure to equitably weigh oil and gas as resources deserving of equal consideration with the more traditionally recognized surface resources is disappointing for a planning effort of this magnitude. 5

Forest Service Response

137-4 The statement that the mineral resources most likely to exert environmental effects are oil and gas is the Forest Service perception based on observation of oil and gas development on the Forest and elsewhere, knowledge of the probable effects of ground-disturbing activities such as road building on much of the Forest, and on the mineral development potential for mineral resources other than oil and gas.

The uses of the Forest other than preservation and nonmotorized recreation, such as wood fiber production, domestic livestock production, oil and gas development, developed recreation, and motorized recreation, have been provided for to the extent possible given a stewardship objective. The Forest Service feels that these more commodity-oriented uses have been provided for inbalance with the noncommodity uses in the preferred alternative.

137-5 See response to comment 68-5.

Comment 137

FPD-137-O-L-B
Proj. No.

With the efforts of this industry directed toward accomplishing compatibility as demonstrated by prudent operators and, in Phillips' case, with the Bridger-Lake Field, it is hoped that opportunities will be afforded for genuine cooperation with your offices. The initiative for implementing efforts with inherent regard for environmental concerns and cooperation with the Forest Service as demonstrated by Phillips within this Field demonstrate the role of a responsible constituent within a National Forest. We hope the above comments will be of assistance.

H. L. Love, Jr.
Land Manager
Western Division

HLL:CMM:ac

Comment 138

RECEIVED OCT 3 1985 FPD-138-P-L-C
Proj. No. Orig. Type Assig.

Oct. 2, 1985

Dear Sir:

In response to your fifty year plan I am concerned that you want to cancel out the livestock permits on the Ishawooa hill and Upper South Fork.

It seems like with the growing population of the United States that you would be more concerned about raising livestock for food, than canceling out range permits.

In concern about the Big Horn Sheep herd in this area, there are very few acres where sheep and cows use the same ground.

The Wyoming Gam & Fish in their studies seem to believe that cattle permit should be left. The wild and domestic animal seem to run well together as long as the range is managed properly.

It seems to me like you would rather see the next generation drink oil than eat beef for the way you have set up

1

Forest Service Response

138-1 Prior to any reduction in stocking, range reanalysis will occur, the State Game and Fish will be asked to jointly ride the allotment with Forest Service and permittee, and numbers will be established based on discussion of parties involved.

Comment 138

the oil leasing in this area

Sincerely

Harvey P. Collins

A-A
3322 Southfork Road
Cody, Wyoming 82414

RECEIVED
SHOSHONE NAT'L FOREST
Oct 3 11 31 AM '75
U.S. FOREST SERVICE
CODY, WYOMING

Comment 139

FPD-139-5-1-C
Proj. No. Orig Type Affil

RECEIVED Oct 3 1985

Oct 1, 1985

To: Supervisor Stephen P. Mealey
Shoshone National Forest
P.O. Box 2140
Cody, Wy 82414

As I have observed over many years our National Forest lands are being gradually degraded. More and better roads (leads to increased use), timbering, with many of these sales marginal & a losing situation. Increased oil activity, which is an outright give-away program (about 5 to 7 times under going rates) with little & no recognition for the value to the economy derived from elk & deer.

Six hundred miles of new roads are planned. We hear a lot about the shortage of funds to maintain trails and other existing facilities yet there seems to be [illegible] available to build unwanted roads, (example in the Sunlight Creek dead end roads) and very expensive to maintain.

A complete ban on leasing and drilling is needed until an absolute need is proven.

I think the forest Service should

VT-104

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Forest Service Response

139-1 The values of elk and deer were included in three ways. First, in economic efficiency analysis in terms of the willingness to pay value for hunting and viewing wildlife. Second, in economic impact analysis in terms of the impact of money spent by recreationalists in outings to view wildlife, when hunting, and when those who contract for outfitters and guides come on the Forest to hunt. And third, in social impact analysis in terms of the effects of the Plan on the lifestyles of those living around the Forest and their expectations in terms of wildlife populations.

Beyond this, formulation and analysis of the Plan and alternatives included national, regional and local targets for wildlife populations. This included close coordination with agencies who have primary responsibility for setting and managing population targets such as the Wyoming Game and Fish Department and the U.S. Fish and Wildlife Service.

139-2 In response to numerous concerns, the number of acres managed for timber harvest and the resultant amount of roads has been reduced in the final Plan. In the next fifty years, the Plan projects only eighty miles of new road which will be open to the public. There is projected 120 miles of existing road which will be improved and remain open to the public. An additional 150 miles of new road, and 255 miles of reconstructed existing roads are projected to be closed to the public within the 50 year period. Road construction and reconstruction figures have been corrected. See also response to comments 182-5, 33-9, 80-5, and 44-46.

139-3 The General Mining Laws guide what can or cannot be withdrawn from mineral entry and under what conditions. We direct your attention specifically to Plan, Chapter III in the blue pages under Mining Law Compliance and Administration (General Direction 1C and 2) and Minerals Management Oil and Gas and Geothermal (General Direction 1). All direction found under Minerals Management, supplemented by Plan Appendix K, is intended to protect existing and proposed uses of the land for other resources thereby avoiding the need for withdrawal. If exceptional situations arise, or existing direction is shown to be insufficient, the option of withdrawal remains.

Mineral operations are by law, a viable use of public land. Our charter, provided by Congressional action, is to manage first according to law, and not strictly according to variable market pressures. The mining laws stipulate that lease applications can be made and must be considered for lands not withdrawn. The Forest Plan was selected in large part because it allows mineral activities while recognizing and maintaining the values of clean water, stable wildlife populations, and recreation opportunities which are of primary importance to many Forest users. The Forest Plan affords adequate protection of popular recreation areas, critical wildlife habitat, and other such resource values through application of stipulations and recommended operating procedures. Protection may be in the form of seasonal restrictions or no-surface-occupancy stipulations (see Appendix K of the Plan).

One consideration here is that a lease may never result in actual drilling activity; historically, a low percentage of leases are explored or developed, due in part to market fluctuations and uncertainties.

work with the State game people very closely and not the at odds as I have observed. 4

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I support the Forest Service's recommendation to manage the Clark Fork River to maintain its eligibility for wild and Scenic Status. 5

I not only support the recommendation to withdraw all wilderness and critical grizzly bear habitat from oil + gas development but as I have stated already, all Forest lands be withdrawn from oil + gas development. 6

VI-395

I would like to encourage the Forest Service to manage the Forest with the health of the greater Yellowstone ecosystem and the preservation of wildlife, recreation, and scenery as the highest priority. Wildlife should be managed to achieve 100% of population objectives. Conflicts between wildlife and other Forest uses should be resolved in favor of wildlife. 7

Eliminate timber sales and roads from critical grizzly bear habitat. 8

Eliminate roads into roadless areas. 9

139-4 As indicated in the Plan, close cooperation with the Wyoming Game and Fish will be necessary to achieve plan objectives.

139-5 The Proposed Plan incorrectly states that we can apply for an extension of the protection period for the River. It is contingent upon an act of Congress to protect the River either by including it in the Wild and Scenic River System or by providing additional temporary protection. It is uncertain at this point whether the Clarks Fork of the Yellowstone River will become a part of the National Wild and Scenic Rivers system. The Forest Service and the Administration are in favor of the River's inclusion. Management activities that are within the discretion of the Forest Service will be designed to maintain the River's eligibility. Other activities that are presently within the discretion of agencies such as BLM (minerals) or Federal Energy Regulatory Commission (hydropower development) could affect eligibility characteristics of the Clarks Fork. In the event such developments are proposed, we would recommend denial to the appropriate agency, until Congress acts. See also response to comment 97-1a.

139-6 See response to comments 51-3 and 68-8.

139-7 See response to comment 59-46, 8-4 and 24-1.

139-8 It is recognized that disturbance activities such as timber sales can displace grizzly bears and potentially increase the risk of bear mortalities. Mitigation measures such as provisions for adjacent security areas and stringent controls on timing and administration of activities will be incorporated as necessary in timber sales. As indicated, logging can improve the quality and quantity of bear foods.

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Eliminate roads and timber sales in the following areas: Deep Lake, Dunoir Valley, Sawmill Creek, North of Sinks Canyon, lands surrounding Northern Meadows, Fiddler Lake to Christina Lake, and areas surrounding wilderness area and Yellowstone National Park. 9

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Eliminate any development that conflicts with wildlife use on critical big game range or occupied grizzly bear habitat. 10

Add alternatives which do not assume benefits to wildlife and recreation from increased roads and timber harvests. 11

Elmer Ratcliff

ELMER RATCLIFF
1175 LANE 9 RT 1
POWELL, WYO. 82435

Forest Service Response

139-9 There is no timber sale in the Deep Lake area. See response to 51-5.

139-10 See response to comment 6-5 and direction for Management Areas 5A and 5B shown in the Forest Plan.

139-11 See response to comments 44-1 and 182-5.

L. GARY LUNDVALL
114 MONUMENT HILL
CODY, WYO. 82414

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Proj. No. Orig Type Arrl

STEPHEN P. MEALEY
SHOSHONE NATIONAL FOREST
P.O. BOX 2140
CODY, WYO. 82414

STEVE:

SOME OF MY COMMENTS CONCERNING THE LONG RANGE FOREST PLAN.

I BELIEVE ALL PRIMITIVE LANDS BORDERING WILDERNESS AREA BOUNDRIES, WHICH SERVE AS BIG GAME WINTER RANGES, SHOULD BE WITHDRAWN FROM OIL AND GAS LEASING. SHOULD REMAIN ROADLESS. 1

THE WYO. GAME AND FISH DEPT. AS WELLAS SELECTED INDEVIDUALS FROM EACH COMMUNITY THAT IS BEING CONSIDERED SHOULD BE ASKED TO HELP IDENTIFY THOSE AREAS THAT SHOULD NOT BE EXPLOITED. 2

THE HIGHEST PRIORITY OF THE USFS SHOULD BE TO MAINTAIN AND MANAGE THOSE PRISTINE, PRIMITIVE LANDS FOR THEIR WILDLIFE, RECREATIONAL, AND SCENIC VALUES. I'M TALKING OF THE NORTH AND SOUTHFORK, SUNLIGHT AND CRANDALL, AND THE BEARTOOTH AREAS. THE AREAS THAT I AM FAMILIAR WITH.

SEEMINGLY THAT IS ABOUT THE ONLY INHERITANCE OF ANY VALUE WE CAN PASS ON TO FUTURE GENERATIONS. 3

STEVE, WE THRU THE POLITICAL PROCESS HAVE CREATED A LOT OF GRAY AREA BETWEEN YES AND NO AND IT DOESN'T BELONG. THE LONG RANGE GOALS SHOULD BE TO PROTECT OUR UNRENEWABLE NATURAL RESOURCES ABOVE ALL.

I DO SUPPORT KEEPING THE WILD AND SCENIC STATUS FOR THE CLARKS FORK RIVER. 5

WILL BE TALKING WITH YOU.

GARY LUNDVALL

140-1 There is no legal mandate or precedent for providing "no lease" buffer zones as you suggest. Rather, congressional intent runs in opposition to the establishment of wilderness buffers, as stated in the Wyoming Wilderness Act of 1984.

Management of crucial preferred winter range, and other sensitive wildlife habitats, was designed in consultation with the Wyoming Game and Fish Department. It has been determined that generally, some operations can occur within these areas outside of critical times. Because of the possibilities for mitigation using seasonal controls, lease denial in such areas is not reasonable.

The procedure used to apply stipulations and recommended operating procedures found in Plan, Appendix K addresses crucial preferred winter range. This procedure is designed to recognize the primacy of some resources in some situations over oil and gas. The procedure is flexible enough, by providing for additional environmental analysis, to encompass the needs of wildlife in specific areas as they are identified in the future. We maintain that oil and gas can be allowed and controlled in ways that will assure wildlife needs are met.

140-2 Starting in 1969, input from individuals, groups and other agencies was sought in development of the Plan. This included close coordination with the Wyoming Game and Fish Department and many local citizens. A series of meetings was held in the Spring of 1984 to brief interested individuals, groups and agencies as to how planning was being done. In the fall of that year, the public was invited to inspect all options being considered for each part of the Forest and express their ideas concerning these. As documented in Chapter IV and Appendices B and F of the EIS, many individuals, groups and agencies did participate in these activities and were directly involved as part of formulation and analysis of alternatives.

The public was given ample opportunity to give input on the proposed plan in general and for specific areas. There have been numerous meetings over the last two years involving the Plan all of which were announced in newspapers and on radio stations. Newsletters have been sent announcing availability of personnel and planning materials and inviting concerned parties to get involved.

140-3 See response to comment 42-1.

140-5 The Proposed Plan incorrectly states that we can apply for an extension of the protection period for the River. It is contingent upon an act of Congress to protect the River either by including it in the Wild and Scenic River System or by providing additional temporary protection. It is uncertain at this point whether the Clarks Fork of the Yellowstone River will become a part of the National Wild and Scenic Rivers system. The Forest Service and the Administration are in favor of the River's inclusion. Management activities that are within the discretion of the Forest Service will be designed to maintain the River's eligibility. Other activities that are presently within the discretion of agencies such as BLM (minerals) or Federal Energy Regulatory Commission (hydropower development) could affect eligibility characteristics of the Clarks Fork. In the event such developments are proposed, we would recommend denial to the appropriate agency, until Congress acts. See also response to comment 97-1a.

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October 1, 1985

Shoshone Nat'l Forest
P.O. Box 2140
Cody, WY 82414

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Comments of Shoshone Forest Plan

Please take into consideration that areas around Yellowstone National Park are part of an ecosystem and should be treated as such. Please, no more road building, timber cutting or oil and gas leases in these fragile areas. The Shoshone should be considered mostly recreational. Cut back plans for road construction in areas that are currently roadless. 1

The endangered grizzly bear should be protected by forest management, not hindered by it. 2

Thanks for listening!

Vicki Gill King
2621 Southfork Rd.
Cody, WY 82414

Forest Service Response

141-1 In response to numerous concerns, the number of acres managed for timber harvest and the resultant amount of roads has been reduced in the final Plan. In the next fifty years, the Plan projects only eighty miles of new road which will be open to the public. There is projected 120 miles of existing road which will be improved and remain open to the public. An additional 150 miles of new road, and 255 miles of reconstructed existing roads are projected to be closed to the public within the 50 year period. Road construction and reconstruction figures have been corrected. See also response to comments 182-5, 33-9, 80-5, and 44-46.

The Forest Plan will guide management over the next 10 to 15 years and will be revised every 15 years or sooner in response to major changes in information or needs of the American public. Projections over 50 years are provided to portray long term consequences only.

141-2 Adequate protection measures for the grizzly are in the Grizzly Bear Guidelines and in standards and guidelines of Chapter III of the Plan. Site-specific projects will be analyzed in accordance with National Environmental Policy Act and the Endangered Species Act.

RECEIVED Oct 3 [illegible]

FPD-142 P L B
Proj. No. Orig Type Appl

Stephen P. Mealey
Forest Supervisor
Shoshone National Forest
Box 2140
Cody, WY 82414

October 2, 1985

Dear Sir,

I wish to enter these comments on the forest plan.

The plan itself is probably basically a good plan; however these are the drawbacks I discovered:

1) I feel the oil and gas leasing should be disallowed. The forests were set aside for all to enjoy forever; oil and gas leases, by their very nature, exclude all other uses. | 1

2) The dramatic increases in road construction are obviously to benefit the timber industry. This, I feel, harms wildlife and even causes them to leave the area. By having better access and easier access we will have debris and litter desecrating our forests. We should rather preserve our forests. | 2

3) The Clarksfork deserves to be a Wild and Scenic River. It would be irresponsible to develop it for water storage. | 3

Lynne Chadwick D.V.M.
Box 72
Cody, Wy 82414

cc: James Torrence
R. Max Peterson
Senator Malcolm Wallop
Senator Alan Simpson
Senator James McClure
Representative Richard Cheney
Representative Bruce Vento

142-1 The General Mining Laws guide what can or cannot be withdrawn from mineral entry and under what conditions. We direct your attention specifically to Plan, Chapter III in the blue pages under Mining Law Compliance and Administration (General Direction 1C and 2) and Minerals Management Oil and Gas and Geothermal (General Direction 1). All direction found under Minerals Management, supplemented by Plan Appendix K, is intended to protect existing and proposed uses of the land for other resources thereby avoiding the need for withdrawal. If exceptional situations arise, or existing direction is shown to be insufficient, the option of withdrawal remains.

Mineral operations are by law, a viable use of public land. Our charter, provided by Congressional action, is to manage first according to law, and not strictly according to variable market pressures. The mining laws stipulate that lease applications can be made and must be considered for lands not withdrawn. The Forest Plan was selected in large part because it allows mineral activities while recognizing and maintaining the values of clean water, stable wildlife populations, and recreation opportunities which are of primary importance to many Forest users. The Forest Plan affords adequate protection of popular recreation areas, critical wildlife habitat, and other such resource values through application of stipulations and recommended operating procedures. Protection may be in the form of seasonal restrictions or no-surface-occupancy stipulations (see Appendix K of the Plan).

One consideration here is that a lease may never result in actual drilling activity; historically, a low percentage of leases are explored or developed, due in part to market fluctuations and uncertainties.

142-2 In response to numerous concerns, the number of acres managed for timber harvest and the resultant amount of roads has been reduced in the final Plan. In the next fifty years, the Plan projects only eighty miles of new road which will be open to the public. There is projected 120 miles of existing road which will be improved and remain open to the public. An additional 150 miles of new road, and 255 miles of reconstructed existing roads are projected to be closed to the public within the 50 year period. Road construction and reconstruction figures have been corrected. See also response to comments 182-5, 33-9, 80-5, and 44-46.

142-3 The Proposed Plan incorrectly states that we can apply for an extension of the protection period for the River. It is contingent upon an act of Congress to protect the River either by including it in the Wild and Scenic River System or by providing additional temporary protection. It is uncertain at this point whether the Clarks Fork of the Yellowstone River will become a part of the National Wild and Scenic Rivers system. The Forest Service and the Administration are in favor of the River's inclusion. Management activities that are within the discretion of the Forest Service will be designed to maintain the River's eligibility. Other activities that are presently within the discretion of agencies such as BLM (minerals) or Federal Energy Regulatory Commission (hydropower development) could affect eligibility characteristics of the Clarks Fork. In the event such developments are proposed, we would recommend denial to the appropriate agency, until Congress acts. See also response to comment 97-1a.

Comment 143

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Proj. No. Orig Type Affil

411 N. 2nd West
Riverton, Wyo. 82501
Oct. 1, 1985

Shoshone National Forest
P.O. Box 2140
225 W. Yellowstone Ave.
Cody, Wyo. 82414

Dear Sirs:

I have read the proposed Land and Resource Management Plan for the Shoshone National Forest which was released by the USDA Forest Service in May, 1985. I have also read the Draft Environmental Impact Statement and attended public meetings. As a 32 year resident of Fremont County and an active forest user, I have a keen interest in what is developed as a final management plan for the Shoshone National Forest. There are some areas of this initial proposal with which I do not agree.

Primarily I am opposed to the emphasis placed on timber sales and road construction at the expense of wildlife and recreation. I would like to see the areas contiguous to Yellowstone National Park managed with primary consideration given to the overall health of the Greater Yellowstone Ecosystem. This would exclude road construction, oil and gas leasing, and timber harvesting. I would like to see timbering and road construction halted instead of increased in the DuNoir and Union Pass areas. Currently roadless areas around existing wilderness areas should be managed for nonmotorized recreation, and withdrawn from oil and gas leasing. 1

I seriously question the rational of below cost timber sales, which have consistently occurred during recent years in the Shoshone National Forest. The idea of increasing timber harvesting is detrimental to all forest users except the timber industry. The suggested benefit of increasing summer forage for large game animals is countered by the Wyoming Game and Fish Commission, which maintains that winter range and forage is the limiting factor for herd size in our climate, and said winter range is primarily not located in the national forest. 3

The proposed plan hopes to accomplish regrowth constituting standing cover in clear cut areas within 20 years after the timbering occurs. I have personally observed a number of clear cut areas in the northwestern end of the Wind River Valley which are 35-40 years old and show virtually no significant regrowth as yet. I seriously question the possibility of accomplishing this 20 year goal, given our climate and conditions. In addition, the plan lacks any specefic monitoring system to evaluate whether or not regrowth does occur satisfactorily in the designated time period. There is no mention of what action would be taken should regrowth not occur according to schedule. Nor is any budget mentioned for said necessary monitoring. 4

The large amount of road construction and reconstruction proposed in the plan is far too high. The Wyoming Game and Fish Commission recommends a maximum of 1.2 miles of open road per square mile. The Forest Service's proposed acceptable open road density of 4 miles per section is radically too high. Road densities of this magnitude totally disrupt wildlife movement through and use of the affected areas, as well as being detrimental in the extreme to any non-motorized recreational use of the areas. The suggestion of opening 5

Forest Service Response

143-1 See response to comment 8-3, 35-4 and 24-1.

143-3 See response to comments 14-3, 44-43 and 44-44.

143-4 See General Direction in Standards and Guidelines found on pages III-64 through III-66 of the Proposed Plan.

143-5 To access all timber in a continuously timbered area requires approximately 4 miles of road per square mile. The majority of these roads are local and are scheduled to be closed following timber harvest. Road management decisions and the decisions to build new roads are based on a consideration of all resources in an area, including wildlife needs and the targeted recreation opportunities being provided. The Forest Service is well aware of problems in road closure enforcement. See also response to comments 146-14. The standards for road densities contained in the forest standards and guidelines and in the individual management area prescriptions have remained unchanged.

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roads temporarily or seasonally again raises questions of monitoring. Obviously a sign closure does not equal an unused road. This problem of monitoring as well as funding is not addressed. 5

Ultimately, I very much hope to see a more balanced management approach in the final Shoshone National Forest Plan. Management for recreation and wildlife is every bit as valid as management for timbering and mineral development, economically as well as aesthetically. Thank you.

Sincerely,

Connie J. Wilbert

Connie J. Wilbert

c.c. Gov. Ed Herschler
Senator Alan Simpson
Seantor Malcom Wallop
Rep. Dick Cheney

Comment 144

RECEIVED OCT 3 1985

WYOMING CHAPTER

The Wildlife Society

FPD-144-F-L-E
Proj. No. Orig Type Affil

Stephen P. Mealey
Forest Supervisor
Shoshone National Forest
P.O. Box 2140
Cody, Wyoming 82414

Dear Mr. Mealey:

The Wyoming Chapter of the Wildlife Society respectfully offers our comments on the proposed Shoshone National Forest Plan. We have carefully reviewed the plan and its wildlife implications, and find that it discusses most of the Chapter's concerns.

As you know, the Wildlife Society supports sound multiple use management practices which provide for adequate wildlife populations and their habitats. We approve the selection of Alternative O, which emphasize non-commodity values while maintaining current levels of commodity production. In reviewing the draft Forest Plan, we recognize the Shoshone National Forest's commitment to managing big game, non-game, and threatened and endangered wildlife species habitats. However, our review revealed several areas that we feel need to be clarafied or revised, to better provide for wildlife.

General Comments

We strongly encourage inter-agency coordination to resolve conflicts between wildlife and other resources. The U. S. Forest Service should work closely with the Wyoming Game and Fish Department to achieve state population objectives. Also, close coordination with the Bureau of Land Management to integrate activities (road building, oil/gas development, habitat improvement) occurring on adjacent lands is encouraged. While recognizing the inherent difficulty, the Chapter urges a "cummulative-effects-analysis" for wildlife, addressing timber harvest, livestock management, mineral exploration and recreational impacts. 1

Forest Service Response

144-1 To the extent reasonable or practical it is the intent of the Plan to evaluate the effects of all proposed activities on wildlife. The DEIS was a first attempt at identifying such effects. Site-specific analysis in accordance with provisions of the NEPA will follow as the Plan is implemented. We agree cooperation and coordination with other agencies will be necessary. See 139-4.

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Stephen Mealey
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It is generally accepted that winter range is the primary limiting factor for most big game herds. Thus, any loss of winter range on the forest is unacceptable since losses on adjacent private lands are already occuring. We commend the adoption of an active habitat management program involving prescribed fire and other vegetative manipulation. However, vegetation treatments should be well dispersed over the forest, and should be developed in close cooperation with the Game and Fish Department.

Timber Management

Proper sale design and layout (including road location) need to be coordinated with the Game and Fish Department. Standards and guidelines described in the plan need to be implemented with each analysis area to preserve, enhance, or create habitat diversity. Before timber harvest is permitted in adjacent stands, adequate regeneration must occur on cut over areas to provide elk, deer, and moose hiding cover. Existing security and thermal cover on mostly-open winter ranges needs to be preserved, with management directed toward proper cover-forage ratios. 2

Road Management

Open roads have the greatest potential for negatively impacting wildlife habitat. The Chapter encourages the adoption of an "open-road" quota on the Shoshone National Forest. If new roads are opened, others must be closed. New road construction should be kept to a minimum, and resulting roads should be closed seasonally or year long to minimize conflicts with wildlife. Roads should be built to minimum standards, then closed or obliterated. Gates may be ineffective as road closures unless inspections are increased and enforcement strengthened. 3

Livestock Management

The Chapter endorses the position that grazing should be managed to be compatible with the maintenance and perpetuation of wildlife habitat. Many existing allotments may be over stocked, resulting in degradation of sensitive wetland and riparian areas through trampling and forage conflicts between livestock and wildlife, especially on winter ranges. 4

VI-403

144-2 The Forest Service, under the NEPA process and the Forest Plan intends to do just as suggested.

Standards and Guidelines will be followed, and will serve to adequately maintain or enhance wildlife habitat.

144-3 In response to numerous concerns, the number of acres managed for timber harvest and the resultant amount of roads has been reduced in the final Plan. In the next fifty years, the Plan projects only eighty miles of new road which will be open to the public. There is projected 120 miles of existing road which will be improved and remain open to the public. An additional 150 miles of new road, and 255 miles of reconstructed existing roads are projected to be closed to the public within the 50 year period. Road construction and reconstruction figures have been corrected. See also response to comments 182-5, 33-9, 80-5, and 44-46.

144-4 See response to comment 52-1. If necessary, livestock will be excluded to enable the establishment of the new vegetation.

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Stephen Mealey
Page 3

Extensive "open-season-long" grazing management leads to stream and wetland degradation, damage to banks and channels, and erosion/siltation problems. We encourage the Shoshone National Forest to maintain the integrity of high wildlife-use wetland and riparian areas, to protect fisheries, wildlife and water yields. Fencing standards need to be addressed and implemented, and if well-planned, structural and range improvements outside wetland and riparian areas should contribute to preserving riparian zones.

Existing grazing allotments should be closely scrutinized for livestock/wildlife conflicts, especially forage competition on big game winter ranges. The concept of preserving forage for wildlife is basically a good one; however, steps need to be taken to avoid a "wildlife backlash" if livestock A.U.M.'s are reduced. Conflicts should be resolved cooperatively between the permittee, U.S. Forest Service and the Wyoming Game and Fish Department, and based on the need to maintain forage at proper levels. 4

Structural and range improvements to achieve better distribution of livestock are encouraged, thus reserving forage on wildlife wintering areas while still allowing livestock grazing. On areas of vegetative manipulation for wildlife habitat improvement, livestock should be excluded for at least one and preferably two full growing seasons following treatment.

Mineral Exploration

The Chapter supports the recommendation of "no-lease" for oil and gas exploration within grizzly bear situation I areas. We would like to see more stringent stipulations and operating plans developed and implemented for mineral activities in other sensitive wildlife areas (big game winter ranges, birthing areas, riparian habitat, grizzly bear spring/fall foraging areas, etc.). These operating plans should involve the use of non-conventional methods (i.e. airlift, non-motorized access, buried pumps/pipelines, electronic surveillance, off-site collection) in situations which jeapordize sensitive wildlife areas. 5

Minerals activity could block migration routes, render suitable habitat functionally unavailable, cause displacement and added stress, result in undesirable distribution, and may increase damage claims on adjacent private lands. In light of these impacts, we recommend that seasonal closure occur from 1 December to 30 June on big game winter ranges and birthing areas, and 1 April to 30 June in grizzly bear spring foraging areas. Also, we strongly encourage "no-lease" or "no-surface-occupancy" recommendations on big game crucial winter ranges and other critical areas such as migration routes, and unique habitats for T & E species, including grizzly bear situation II areas. 6

144-5 Appendix K of the Plan outlines a process whereby many of the issues and concerns you raise will be considered prior to leasing in the sensitive areas you have described. Many of the mitigation measures you have described can be found in Appendix K, along with the example of how they might be used. See also response to comments 68-8 and 43-1.

144-6 See response to comment 59-23 and 97-62.

Seasonal closure dates for gizzly bear protection will be closely coordinated with the Wyoming Game and Fish Deparment and the the U.S. Fish and Wildlife Service. As required by law, projects such as mineral exploration, timber sales, etc., that may effect the grizzly will be evaluated and appropriate actions taken to insure the continued existence of the species is not jeapordized. Off-site mitigation measures were not analyzed since activities not compatible with wildlife objectives would not be allowed.

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Forest Service Response

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Habitat improvements as a potential means of off-site mitigation for mineral exploration must be concurrent with that activity, not just limited to the post-production reclamation phase. Displacement of wildlife caused by minerals activities should not be considered temporary and insignificant; rather, steps should be taken to ensure that displaced animals have adequate habitats to disperse to, or the minerals activity should not be allowed. 6

Riparian Areas

The Chapter is pleased to see the Shoshone Forest Plan discuss the requirement for Forest Service management of wetlands and flood-plains under Executive Orders 11990 and 11988. It should be kept in mind that all streams qualify as wetland habitat under the U.S. Fish and Wildlife Service's classification system regardless of whether they support a fisheries or a significant riparian zone or not.

In the Plan, the present percentage or number of acres of wetland/riparian areas in each condition class (poor to excellent) should be given, as well as the projected percentages or acreages in the different classes under the various alternatives. Without this information, it is impossible to evaluated the effects of each alternative on the wetland/riparian habitats on the Shoshone. 7

Throughout Appendix J, existence and management of "high quality riparian habitat" is addressed for various analysis areas. We feel areas of "medium and lower quality" also need to be addressed, with specific steps identified to improve riparian zones in the poorer condition classes.

Old Growth/Habitat Diversity

We support the recognized need to provide habitat for early-, mid-, and late-successional stage wildlife species. Retention of old-growth stands, widely distributed throughout the forest, will do much to satisfy the habitat needs of "late-succession" indicator species including goshawks and pine marten. Vegetative manipulation should be well distributed, to avoid over-impacting certain areas of the forest and to improve wildlife distribution. 8

Monitoring

To adequately evaluate implementation of management direction described in the draft Forest Plan, monitoring is essential. Funding for monitoring needs to be a high priority, and the Chapter urges the Shoshone National Forest to strive to obtain that funding. Benefits and/or impacts to wildlife from timber harvest and regeneration, livestock/wildlife range improvements and forage production and oil/gas exploration and development must be identified, and development activities must be modified if adverse effects are disclosed. Monitoring with inter-agency cooperation and coordination is essential, to realign managment direction in light of improved knowledge. 9

144-7 See response to comment 67-4.

144-8 We concur to the extent compatible with existing laws and regulations. Planned habitat improvement for wildlife in wilderness is prohibited by law except for Whiskey Mountain.

144-9 Monitoring and evaluation of the implementation of Forest Plans are required by 36 CFR 219.12(k). Funding for these activities are currently being built into agency budget requests. Funding for an adequate monitoring program will become a part of the Forest Service's regular budget. Should adequate funding for monitoring not be appropriated by Congress, plans will be made to provide for monitoring within available resources since this action is required by law.

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Stephen Mealey
Page 5

Key monitoring areas should be established in wetland/riparian areas to ensure stream zone objectives are being met, especially in riparian areas grazed by domestic livestock. Utilization studies and range condition and trend analysis should be intensified, to identify wildlife/livestock conflicts and suggest opportunities for resolving those conflicts. Regeneration inspections on cut-over areas would fine-tune timetables for acheiving adequate stocking rates (stems/acre) to provide hiding cover for deer and elk. 9

Grizzly Bear

The Chapter recognizes that the Shoshone National Forest is an integral part of the greater Yellowstone ecosystem. We concur that this region offers one of the few remaining opportunities to sustain a viable grizzly bear population. We are aware of the key role the Shoshone National Forest will play in acheiving recovery of the Yellowstone grizzly, and we strongly urge the U.S. Forest Service to take the necessary steps, to accelerate recovery, and to stand firmly behind those often-unpopular decisions.

We endorse the management of grizzly bears through the Yellowstone Guidelines. However, modifications need to be made in those guidelines. For example, existing Situation Management designations need to be updated, to reflect the most recent biological data. In some instances, we are aware that Situation lines were drawn based on political considerations, and not on biological fact. We strongly urge the Forest Service and other cooperators on the Yellowstone Guidelines to update the exisiting management situation boundaries based on most current data. 10

We also encourage the Shoshone National Forest to take measures to accelerate recovery of the grizzly bear. Under the preferred alternative, no enchancement of grizzly bear habitat is planned. This oversight must be corrected. Habitat maintenance and enhancement efforts need to be planned and implemented, to assist in recovery. Included here are road closures and elimination or reduction of timber harvest in important grizzly bear habitats (especially the Clark's Fork Ranger District). A certain amount of timber harvest is beneficial to bears, but they also require adjacent escape cover and daybed sites. Bears may not use areas of good food production if mature timber stands are not available as security cover. Also, increased food production via timber harvest may be over shadowed by increased human access and heightened potential for bear-human conflicts. The present forest plan calls for timber harvest of such high frequency and intensity, especially in the Clark's Fork and Crandall areas, that grizzly bear use may be severly affected in the next decade.

Forest Service Response

144-10 The Guidelines are currently being revised. Future revisions in Situation lines may also be made as justified.

Comment 144

FPD 144 F L E

Stephen Mealey
Page 6

We approve of the Forest Service's recommendation to the BLM of "no-lease" for oil and gas in grizzly bear Situation I areas. In addition, to accelerate recovery of the Yellowstone grizzly population the Chapter recommends "no-surface-occupancy" for Situation II areas. As a minimum, stringent stipulations and operating plans should guide any mineral exploration in occupied grizzly bear range. 11

The southern portion of the Shoshone Forest contributes to production of greater sandhill cranes. Whooping crane (endangered species) has been documented on habitats adjacent to the forest. The whooping crane summers in close association with and in habitats occupied by the sandhill crane. We suggest your Lander and Dubois district keep Dave Lockman (WGFD) informed on plan coordination for wetland and riparian habitats to alleviate conflicts with cranes. 12

The Wyoming Chapter of the Wildlife Society recognizes and supports Forest Service planning efforts that integrate the management of all resources. We appreciate the opportunity to review the draft Shoshone Forest Plan and present our views. We commend you and your staff on the effort you are making to equally consider wildlife with the other forest resources. We look forward to analyzing the Final Plan and EIS.

Sincerely,

Dave Lockman

Dave Lockman
President, WY-TWS

CC: James Torrence, USFS
Bill Morris, WGFD

Leonard Serdiuk
Mi[illegible]y Bird Supervisor
[illegible]60 Bu[illegible] Vista
Lander, Wyoming [illegible]

Forest Service Response

144-11 We feel that adequate protection can be provided in Grizzly Bear Situations II through the principles applied in Appendix K. We see little opportunity to accelerate recovery of the grizzly by doing otherwise. See also response to comment 68-8.

144-12 Cooperation with Wyoming Game and Fish Deparment will be necessary for all wildlife species.

Comment 145

Forest Service Response

Wyoming State Legislature

FPO-145-F-L-C
Proj. No. Orig Type

213 Capitol Building Cheyenne, Wyoming 82002 / Telephone 307/777-7881

RECEIVED OCT 3 1985

REPRESENTATIVE HARRY B. TIPTON
Fremont County
745 Buena Vista
Lander, Wyoming 82520
Committees:
Judiciary
Labor, Health and
Social Services

October 1, 1985

Stephen P. Mealey
Shoshone National Forest Supervisor
P. O. Box 2140
Cody, Wyoming 82414

Dear Supervisor Mealey:

The greater Yellowstone correlation has suggested that comments should be made regarding the proposed Shoshone National Forest plan. I believe legislators all received a copy of the plan.

I felt that it was a fairly well balanced effort. A number of years ago committment was made to a multiple use of public lands. Since then we have seen increasing pressure from certain groups to limit use of these lands, particularly in the National Forest, and to extend the boundries of wilderness areas.

The wilderness areas and roadless areas are attractive and desirable but there are reasons to continue multiple use planning. The economy of Wyoming is dependant upon the conservative use of natural resources. I feel that the areas that have been set aside are adequate. The remaining public lands should be utilized for the benefit of all and not a select small group who have the time and the economic resources to visit the wilderness areas.

I would hope that the Forest Service would be able to stay fairly close to the plan as proposed.

Sincerely,

H. B. Tipton, Representative
Wyoming State Legislature

HBT/ska

Thank you for your comment.

Comment 146

Forest Service Response

RECEIVED OCT 3 1985

FPD-146-F-L-F
Proj. No. Orig Type Affil
1610

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
LANDER RESOURCE AREA
Highway 287 South
P.O. Box 589
Lander, Wyoming 82520

Telephone: 307/332-7822

October 2, 1985

Stephen P. Mealey
Forest Supervisor
Shoshone National Forest
P.O. Box 2140
Cody, Wyoming 82414

Dear Mr. Mealey:

I have asked some of my staff to review your proposed Land and Resource Management Plan since we are adjoining neighbors in some of the areas involved in both the Lander and Wind River Ranger Districts. You may be aware that we too are in the final stages of planning for the Lander Resource Area. We anticipate that the draft Lander Resource Management Plan and EIS, along with supplemental EIS's for Wilderness and Grazing, will be published for a 90 day comment period in mid-November. I felt that a review and comments would be especially pertinent in the interest of achieving as much coordination and consistency as possible where we administer adjoining lands. Since both plans are still in the draft stages, I would be interested in getting together with the District Rangers to work out any differences in management prescriptions if such is the case.

Our staff comments were quite favorable concerning your plan, including the resources considered, the thoroughness of the data and analysis, and the proposed decisions, so naturally our comments will pertain mainly to those elements where we have a question or a seeming difference.

Range

We have no concerns with the general management prescriptions and did not identify any specific conflict between the FS and BLM proposals. We did note that the grazing section is not broken down into allotments, so that makes it difficult for us to compare with our adjoining allotments. We will work with the Lander Ranger District in particular to ascertain what specific allotment grazing or range improvement projects will take place. 1

146-1 Allotment boundaries do coincide with analysis areas.

FPD-146-F-L-F
Proj. No. Org. Type

Minerals

We did not identify any specific inconsistencies with the leasing proposals. There could be some depending upon the stipulations selected for individual lease proposals. Forest Service/BLM coordination on those proposals would minimize or eliminate any inconsistencies.

Lands

There were no proposals affecting the adjoining BLM.

Soil, Air & Water

We would like to know the intensity (third order?) of the soil survey to be able to compare for the adjoining BLM lands.

We were able to find vegetative rehabilitation information only on the wilderness areas. Are there management recommendations for the other areas such as the ones adjoining BLM? **2**

The discussion on air monitoring doesn't include site locations or data gathering parameters. Is that information available?

Timber

The Forest Plan Detail (Appendix J) does not address timber as a resource in either the Dickinson Park or Shoshone Lake Units. Is that due to lack of economic viability? A seeming disparity is that the Management Area Map does show Shoshone Lake as a 7E Management direction for sawtimber. This is of particular interest to us because we are considering the adjoining BLM administered lands to the east as being available for timber harvest. If you do plan on a sale in the Shoshone Lake area, I would like to recommend consideration of a joint sale. **3**

The plan doesn't seem to show timber sale volume by district or unit.

There may be differences in our fire management plans for adjoining lands. Even though we haven't had time yet, we will make a map of the corresponding FS lands and the pertinent fire prescriptions and see what conflicts may exist. If there are some, we will contact you.

On page J-153 under Transportation for the Shoshone Lake Unit, it states that purchase of 11 miles of right-of-way would be required on the Shoshone Lake road. It's just a matter of semantics, but you wouldn't have to "purchase" a right-of-way through the BLM administered portion, of course. **5**

Wildlife

Page J-147 discusses the bighorn sheep transplant in Sinks Canyon being scheduled for January, 1985. That misprint should be 1986. **4**

There doesn't seem to be a complete discussion of the planning & management for the Whiskey Mountain Bighorn Sheep Winter Range. For example, the Range discussion talks about the grazing but does not specifically address the concern with competition between livestock, elk and the sheep. **6**

146-2 The soil survey will not be complete until 1990 at the earliest. When completed, the survey will be at order 3 - mapping of soil associations and complexes with some management interpretations.

It is unclear what precisely is meant by "vegetative rehabilitation information". We encourage you to refer to the Plan Detail Map - Analysis Areas found in the back envelope of the Plan. The Map is a guide to area specific management recommendations found in the Plan, pink pages. Please contact us if you have further questions.

Also, please contact our office for specifics regarding air monitoring. The action plan for this monitoring effort can be made available to you.

146-3 No timber sales are planned for the first ten years in Shoshone Lake or Dickinson Park Analysis Areas. The map has been corrected. See Appendix A Plan for volumes by timber sale, by year, by Ranger District.

146-5 Wording has been changed from "purchase" to "acquire".

146-4 This date has been corrected.

146-6 See Management Area 8E in the Forest Plan.

FPD-146-F-L-F

Proj. No. [illegible]

We also understand that an additional Management Area Direction has tentatively been added for the Glacier addition to the Fitzpatrick Wilderness that would place restrictions on management actions for the bighorn sheep at Whiskey Mountain. We would like to recommend that the management prescription ultimately selected allow the maximum flexibility for managing the Whiskey Mountain bighorn sheep population and habitat to include some habitat improvement projects. **6**

The seasonal closure dates for FS units and adjoining BLM lands are not consistent in some instances, and some units do not have closure dates. I would recommend that the dates be consistent. Our RMP recommends closure dates from December 1 to June 1. Can we get together on these? **7**

146-7 See response to comment 97-62.

Are there any prescribed fires planned in the Lander District? We didn't see any for this district as there are for the Cody areas. **8**

146-8 See response to comment 2-1.

We propose to use year long "no surface occupancy" stipulations on certain crucial big game winter ranges such as in the East Fork Big Game Winter Range. Does the Forest Service want to consider the same type of stipulation on crucial elk winter range adjacent to the boundary on the forest? **9**

146-9 See response to comment 59-23.

Cultural

The requirements for the USFS "to complete cultural resource inventories" by 1990 under the Resources Planning Act could be further explained. Does it mean all lands in the forest are to be inventoried, or that sample inventories designed to predict resources over the entire forest are to be done? What about site-specific surface disturbing activities - will they still need to be inventoried after 1990? **10**

No mention is made of the Warm Springs Canyon flume or of South Pass Mining Area in the Plan. These two sites occur on both USFS land and BLM land. The Lander RMP (Draft) has outlined management plans for the BLM portions of these significant historical properties; we would like to know if the USFS has management proposals or plans for these sites in order to compare and, if necessary, coordinate our management.

146-10 Cultural Resource evaluation and protection is emphasized (see General Direction, Plan page III-21). The program will include coordination with other federal and state agencies to assure that specific areas, such as the South Pass City area, are adequately protected. A full-time archaeologist now has responsibilities for National Forests in Wyoming. Each Forest has paraprofessionals responsible for cultural resource inventories. The Warm Springs Flume is an inventoried cultural resource site and it will be protected as such on both the Forest and neighboring lands administered by the BLM.

Recreation

Our RMP doesn't address access across BLM for the 40 unit campground at Shoshone Lake. Depending on your plans for access, we may need some information so we can address that proposal. **12**

The Meadow Creek discussion (J-146) mentions a right-of-way at Cold Springs. There are two roads and we have recommended in our RMP that one be closed.

146-12 When we start looking at the proposed 40 unit campground at Shoshone Lake and the Cold Springs right-of-way in detail, we will include the BLM as part of the analysis team for each project.

Do you have provisions for road monitoring after a timber sale? We did not notice any. **14**

146-14 Monitoring of roads is a part of the regular law enforcement and other resource management programs. Road closures are in particular monitored for effectiveness.

Comment 146

FPD-146-F-L-F
Proj. No. [illegible]

Please contact me if you have any questions about our comments. And, as I said, we would welcome the opportunity to discuss any differences with you if you feel that we could make the two plans more compatible and uniform for the public.

Sincerely,

Jack Kelly

Area Manager

cc: District Manager, Rawlins
District Ranger, Lander
District Ranger, Dubois

Comment 147

Forest Service Response

Box 1210
Dubois, WY 82513
Oct 2, 1985

RECEIVED OCT 3 1985

FPD-147- F - L - C
Proj. No. [illegible]

Steve Mealey
U.S. Forest Service Supervisor
Shoshone National Forest
P.O. Box 2140
Cody, WY 8244

Dear Mr. Mealey,

We would like to take time now to tell you why we are interested in the continuation of the timber industry in the Shoshone National Forest.

We are fairly new to the area - having lived in Dubois for 7 years. During that time, we have thoroughly enjoyed the forests. The first few years we worked on a ranch and were able to "tour" the forests on horseback while working cattle on forest service land. The last few years, we have lived in town and are running our own business during this time, we have enjoyed the forests while fishing, backpacking and hunting - all the while using roll film photographing this beautiful land.

We have noticed many roads in this area - due to the timber sales. Many fine roads are a detriment. So much of anything is bad - but a few well maintained roads as seen in other

VI-413

2 FPD-147- F- L C

More and more people own four wheel drive outfits and want to get out and see the country. What better than to have a maintained road on which to travel. If that is not available, they will go where they please - tearing up the country causing erosion and consequently stream erosion.

We realize timber sales generate income for the Forest Service - whose budget is pitifully low. As land owners and business owners, we feel higher taxes will be justified if the timber industry is forced out. If the lawmakers close, people will move to find work - which is hard on the local economy. Or - they will stay and get on the welfare rolls - which is hard on the state and national economies. Not a good alternative!

We feel the timber industry actually helps the forests through environmental studies, vegetation manipulation (which is considered in helping the grizzly bear habitation) and through road

VI-414

147-1 It is apparent that you value the Forest for recreational and aesthetic purposes. It seems that you would advocate opportunities for road-related types of recreation. At the same time, you feel that the timber industry is important in maintaining the local economy and providing support to Forest uses such as those you enjoy.

While we are not prepared in this response to deal with the tragic consequences of unemployment, we feel that it is important to maintain historic levels of Forest dependent production of commodities. We feel it is equally important to blend such production with other resource values, both to meet legal requirements (e.g. soil, water and wildlife protection) and to provide quality experiences for other Forest users.

This is precisely the thrust of the Forest's preferred alternative and Plan. Commodity production such as cattle forage, timber harvest and developed recreation is maintained at or near historic levels. A full spectrum of recreation opportunities is provided, from the road related forms you appreciate to pristine wilderness experiences so highly prized by other Forest users.

1

There are inevitably some types of uses which conflict with each other, such that optimum levels of each cannot be provided within the same area. Management considerations in such areas turn to "opportunity costs" and "tradeoffs"; these are discussed in sections of the EIS dealing with economic and social effects. However, with each proposed activity on the Forest, we intend to invoke a number of management standards and guidelines that attempt to provide resource uses according to the capabilities of the land, but not to the exclusion of other competing resource values or uses.

On the final analysis, we are attempting to provide for all segments of the Forest user population, a position which is not free of criticism from some segments. We wish to provide for older people, handicapped people, robust hikers, hunters and people whose livelihood depends on Forest resources. We feel this sharing is in the true spirit of multiple use, as fully intended and mandated by the U.S. Congress in a variety of laws.

Also - there is a large group of older people in this area who enjoy the forests as much as anyone - but hiking and horseback riding are not an alternative for them. Access and enjoyment from a car - the forest is just as special to them.

The National forests belong to us all. Let's learn to share.

Thank you for your time

Sincerely

Mr. & Mrs. Fred D. Bellino

1

Comment 148

RECEIVED OCT 3 1985

FPD- 148- P - L - B
Proj. No. Orig Type Area

Julien Construction Company

General Contractors
P. O. Box 818
Cody, Wyoming 82414
Phone 307-587-6201

• Commercial - Industrial - Institutional Buildings • Fine Custom Homes

October 3, 1985

Stephen P. Mealey, Forest Supervisor
Shoshone National Forest
P.O. Box 2140
225 West Yellowstone Ave.
Cody, Wyoming 82414

Re: Land and Resource Management Plan

Dear Sir:

An attempt was made to visit with you yesterday, but you were in Denver. I did however, spend some time with Jack Sanders and Tom Mitchell, both were very helpful in discussing items I did not fully understand.

I am primarily interested in the Big Creek unit since I own one of the ranches involved in the study.

Under section 132, page J.195, it states "Implementation of this management option requires the purchase of the Big Creek Road R O W".

To do so would require the purchase or acquisiton by other means of 3 miles of private road on four properties. It would also have serious ramifications on land values. 1

Since there now exists a Game and Fish Department trailhead to the National Forest and Wilderness on the North Fork less than a mile distant from the existing private road, it appears to me that it would not be in the best interest of the public to attempt a public road access in that manner.

Users of the existing trail and trailhead cross less than a mile of private grazing land to reach the National Forest.

If ownership is essential for an access, I feel it would be far more practical to obtain the land necessary at the existing trail.

Big Creek and the East Fork of Big Creek appear to have numerous areas where controlled burning would be beneficial for livestock and big game use. 2

Very truly yours,

H. W. Julien

H. W. Julien
1308 Sunset Blvd.
Cody, Wy 82414

VI-416

Forest Service Response

148-1 In order to assure public access to the National Forest via Big Creek Trail, the Forest Service will pursue guaranteed access by the Big Creek road and/or the existing trail system which begins at the Game and Fish Department's fisherman's access and trailhead on the North Fork of the Shoshone River. You should be aware that the three miles of existing road not only crosses four parcels of private property, but also crosses portions of National Forest for which no permit has ever been issued. Resolution of this particular trespass will be given high priority within the first decade.

148-2 We agree. See page J-194 of the Proposed Plan, analysis area 132 - Big Creek.

RECEIVED OCT 3 1985

FPD- 149- P - L - C
Proj. No. Orig Type Attn

October 2, 1985

Supervisor Stephen P. Bradley
Shoshone National Forest
225 West Yellowstone Avenue
Cody, Wy 82414

Dear Steve,

Please accept my comments relative to the draft Shoshone National Forest Plan.

It is my conviction that wilderness as wilderness is one of our most valuable natural resources. It is with this conviction that I appeal to you to preserve those remaining areas that are yet "undeveloped". I support the forest plan to manage the North Fork River so as to maintain its eligibility for wild and scenic status and the recommendation to withdraw all wilderness and critical grizzly bear habitat from oil and gas development. However, I urge you to go even further by halting any additional road building, timber harvesting or oil and gas leasing in currently roadless areas, especially areas surrounding established wilderness areas and Yellowstone National Park.

I am, in fact, familiar with the concepts of biological diversity, succession, sustained yield, etc., and while these concepts, as yet, often mean different things to different people, I feel it is time we transcend our anthropocentric attitudes toward our earth and our resources and intelligently choose to be less consumptive and exploitative.

VI-417

1 149-1 See response to comments 44-46 and 13-1.

2 149-2 See response to comments 51-3, 68-8 and 35-4.

3 149-3 Alternative E reduces domestic livestock grazing and allocates more forage to wildlife. See response to comment 19-2.

The Shoshone National Forest is 57 percent wilderness. The Wyoming Wilderness Act of 1984 specifically mentions release of lands not designated as wilderness for multiple use, specifically condemns the concept of nonwilderness buffers around designated wilderness, and states that lands not designated as wilderness need not be managed to preserve wilderness character. Many of the nonwilderness areas are protected from development because of being critical for wildlife, unproductive for wood fiber production, or critical for visual corridors. Regardless of entry into a few of the many remaining roadless areas, the Forest will remain overwhelmingly unroaded and more or less undeveloped. Our charter is to manage for multiple-use, not just preservation.

Comment 149

2

FPD - 149 - P - L - C
Proj. No. Orig Type Affil

If I may quote Wallace Stegner in "The Wilderness Idea"...

"We need wilderness preserved — as much of it as is still left, and as many kinds — because it was the challenge against which our character as a people was formed.... If the abstract dream of human liberty and human dignity became, in America, something more than an abstract dream, mark it down at least partially to the fact that we were in subtle ways subdued by what we conquered."

With this statement I agree. I also believe that we cannot continue to go on "conquering" with the attitudes of the past. That to continue to do so will be detrimental to the health and well-being of the planet. There is a limit! It is true that 'our' forest, 'our' state and 'our' nation have relatively large remaining areas of lands existing in a 'natural' condition. I feel it is our responsibility as an "advanced" nation to use our technology and (hopefully) wisdom to turn away from those remaining natural areas to meet our material needs.

Thank You.

Sincerely
Marty Stannard
P.O. Box 2348
Cody, Wy 82414

Forest Service Response

4 149-4 See response to comments 42-1 and 44-46.

RECEIVED OCT 3 1985

FPD-150-P-L-C
Proj. No. Orig Type

74 Road 2EC
Cody, Wyoming 82414
October 3, 1985

Mr. Steve Mealey, Supervisor
Shoshone National Forest
Cody, Wyoming 82414

Dear Steve,

This letter contains my comments on the proposed Shoshone Forest management plan.

The plan is an impressive document, obviously representing thousands of hours of work. In many ways, the plan is very useful to someone like myself, in particular Appendix J where I can get some idea of what is proposed for the areas I know best. But the plan is not easy to use, and although I cannot suggest a simpler method, the fact that I must turn from section to section and appendix to appendix to get all the pertinent information on roads or timbering leaves me with the very uncomfortable feeling that I still may be missing something that will turn out to be very important to me, but only after the plan becomes final. To give a specific example, I fear that some day forest officials will announce a road or timber sale I've never heard of, but I will be told that it was right there in the plan. I hope, however, such a thing never happens.

My remaining comments will be limited to five analysis areas: Lake Creek (007), Ghost Creek (006), Crandall (004 and 027), Table Mountain (009) and North Absaroka (020). My concerns and comments follow.

---The Management Area Map shows a lot of 7E on Table Mountain, but Table III-3 does not list that prescription for AA 009.

---The same map, which I'll refer to as the MA Map, indicates with diagonal green lines large areas for Vegetation Treatment, yet there is no single place in the plan or DEIS where I can find out exactly what that is. I can only assume it encompasses both timber harvest and sagebrush eradication, but I would prefer not to have to guess.

---The MA Map shows a broken line on Table Mountain, which the legend describes as an arterial/collecter road to be constructed before 1994. That road is not specifically described in the pink-page description of details for AA 009. I am uncertain when that road will be built and whether it will remain open for public use, and would like to have that clarified.

---I also feel the plan leaves other questions about roads unanswered. The details for Ghost Creek, pages J-26 through J-29, state roads constructed/reconstructed during this

1

150-1 As stated in the Proposed Plan errata sheet for Chapter III, site-specific environmental analysis will be carried out before implementation of any project including those listed in the Plan. The first step is scoping which may or may not include solicitation of public input. The responsible line officer decides, based on information provided to him by his staff, if scoping is to involve solicitation of public input. The text of the errata sheet has been included in the Plan.

Once the plan is final, it respresents a "contract" with the public about how we intend to manage the Forest. As the Plan is implemented, there will be needs to change it. This is due to a variety of reasons such as inaccurate data, budget problems, or changes in the situation like new demands for developed recreation. The public will be notified about all changes on a continuing basis. Such changes can take one of three forms, an amendment to the Plan due to such things as minor problems in data or budgets; amendments which will cause major shifts in management in a localized area; and revisions that cause major shifts in management of the entire Forest. The first of these three will probably be handled merely as public notifications. The second and third type of change will require an environmental impact statement; which means that the public will be notified early that a change is anticipated, public comment will be solicited on the change, alternatives to current direction will be formulated, analyzed and shared with the public for their comment before a decision is made.

The intent is to make the Plan a realistic management tool which is responsive to acquisition of better data and changing situations.

Also see response to comment 44-55.

2

150-2 The 7E Management Area on Table Mountain has been changed to 3A.

3

150-3 If an area is shown as scheduled for Vegetative treatment on the map and there are no timber sales scheduled in that area in Appendix A, the treatment will be for either Aspen or Sage, and will be so described in the respective Analysis Area prescription (Appendix J).

4

150-4 This has been corrected. See response to comment 32-2.

5

150-5 Yes, these roads would also be closed if wildlife considerations remain unchanged.

Comment 150

Forest Service Response

FPD-150-F-1-C
Proj. No. Orig Type Amd

decade will be closed on termination of timber sale activity. I am very much in favor of that. But does that closure apply to the roads mentioned for the second and third decades at the top of J-27? Would any other type of new road also be closed or only roads built for a timber sale?

5

---Timbering is part of forest management, I agree, but I have several concerns about the timber sales proposed in these analysis areas in the first decade. First, although they appear to be planned at regular intervals, I am concerned that there may still be an overall impact because of the fact that trees just grow slowly. In particular, I am worried about some sales that are in AA 006 and 007 and 024, scheduled for 1986-1989, because there could be a negative cumulative impact on wildlife.

6

150-6 There are no sales scheduled in Lost Lake (024). Sales in analysis areas 006 and 007 will be prepared following direction outlined in NEPA.

---The Upper Lodgepole sale in 1990 schedules 900 acres for clearcutting. That sounds like a terrible devastation to me. I know that timber is thick but I would ask if it must be taken primarily by clearcutting. Couldn't there be more acres timbered selectively? I would also like to know what will become of the road(s) for this sale. The road portion that is already being reconstructed looks like it is being built to remain open for recreation but it is not mentioned in the plan.

7

150-7 Upper Lodgepole Sale has been changed and now has only 181 acres of clear cut with the remaining in shelterwood and thinning. All roads constructed for timber harvest will be closed following timber harvest activities.

---Another timber sale that concerns me is the one for Table Mountain in 1993. It is clear that one would take a lot of road building. I object to the roads, and also to timbering on Table Mountain because it is such excellent elk habitat and escape cover. It also happens to be fine recreation space for persons who will go there by foot or horseback, and I would like to see it continued to be managed that way. Any timbering that must be done should only be done in very small patches with selective cutting.

8

150-8 Further economic analysis has shown that timber activity from the Table Mountain area during the first decade would not be viable; therefore, all timber harvest has been removed from the first decade schedule. The Plan has been revised to reflect this change.

---The prescriptions for AAs 006, 007 and 009 show a lot of emphasis on wood fiber production (7E) and on motorized recreation (2A and 2B). Although I cannot find a comparison for these AAs, to current direction, I must assume that both emphases have been increased. I would like to know if that is an accurate assumption. I would also like to say that this assumption makes me uneasy. Two areas, 006 and 007, already sustain heavy recreation demands and I believe that if they are managed to provide very much more recreation, the quality will suffer.

9

150-9 This emphasis remains the same in analysis areas 006 and 007 and with the deletion of the timber sale on Table Mtn., that emphasis changes to 3A in the first decade.

---It would be helpful if the total acres in the AAs were listed in Table III-3. The total cannot be derived by adding up the numbers of acres given across the columns since some management directions overlap. In fact, Table III-3 makes it sound as if 006 and 007 are going to be turned into large motorized and roaded recreation areas, even though Appendix J would contradict that with statements that off-road travel is prohibited and timber roads will be closed.

10

150-10 Acres in each analysis area has been added to Appendix J, Table of Contents.

Comment 150

Steve Mealey, page 3
10/3/85

FPD-150-P-L-C
Proj. No. Orig. Type Appl

---You have said you want the public to tell you how we want the forest to look. I have tried to do that with these comments, and I would summarize by saying that my main concerns are the increases in motorized recreation (up 17% according to the June, 1985 "Background" document) and in lands deemed suitable for timbering (up to 101,000 acres compared to 93,000 acres in the 1976 timber management plan). The real problem is that these are big numbers for the whole forest, but the actual increases tend to get concentrated in certain spots, with the result that impacts are quite high in specific areas.

---Nevertheless, I appreciate the effort that has gone into this plan, and I especially appreciate the opportunity to participate in the planning process. The plan does contain directions that I endorse, in particular the continued protection of the wild character of the Clarks Fork River, the overall increase in non-motorized recreation, and the recommendation of no surface occupancy on 450,000 of the total number of acres that are or will be leased for mineral activity.

---Finally, I hope you make as much effort ten years from now, when the plan is updated, to get public participation as you have on the initial effort.

Sincerely,

Dee Oudin

VI-421

Forest Service Response

11 150-11 Problems in distribution of motorized recreation use did influence the design of prescriptions and choice of the preferred alternative. Standards for dispersion of timber cutting and standards for other aspects of timber cutting are included in the Plan and should keep impacts in specific areas within acceptable levels. Site-specific environmental analysis will be completed for each project before implementation. This will ensure that site-specific impacts are evaluated and controlled. Refer to Proposed Plan errata sheet and Plan, Chapter III, under the heading IMPLEMENTATION.

Comment 151

RECEIVED [illegible] 3 1985

FPD-151-P-L-C
Proj. No. Orig Type Area

P O BOX 2140 1507

CODY, WYOMING 82414

Steve Mealy
P.O. Box 2140
Shoshone National Forest
Cody, Wyoming 82414

Dear Steve

The Shoshone Staff should be congratulated for their cooperation and assistance to those of us who have been interested in the planning process. The welcome mat was always out despite pressures and deadlines on your side.

For those of us who are not involved with the plan in a professional way, there has been a certain amount of frustration at not having the time or expertise to examine the documents in a thorough manner. Your approach to dividing the forest into analysis areas, however, has been a life saver for reading the plan and I hope you will continue to use this format over the years as you update this plan. If the public had been more aware of the usefulness of the appendix, perhaps you would have had more comments. 1

I have restricted my comments to specific areas delineated by numbers in Appendix J. They are based on personal knowledge and concern

002 Basin:

Due to fact this is a critical wildlife area (esp. Grizzly), no oil or gas leasing within this area. Because of the dramatic scenic beauty and high recreation values, no commodity developments. Do 2

VI-422

Forest Service Response

Thank you for your comment.

151-1 Analysis areas were chosen to coincide as much as possible with exisiting administrative units. This means that most implementation will be done in relationship to those boundaries, that updates of data will be done using those boundaries, and that future analysis of necessary changes in the Plan will be done using these boundaries. Because of this, it is nice to know that the public found these boundaries an aid in understanding and commenting on the Plan.

151-2 Oil and gas leasing will not occur in grizzly bear situation 1 areas except for perhaps a 1/2 mile strip within its boundary that could be leased with a no surface occupancy stipulation. Before such a lease would be issued, a separate environmental anaylysis will be done and the public will have an opprotunity to provide input. Timber sales in this area will be coordinated with the needs of the grizzly bear as well as the needs of other wildlife. This area does provide a significant amount of crucial preferred wildlife. Therefore seasonal restrictions will be placed on such things as public use of roads, timber operations and any oil and gas operations including seismic operations that may be proposed (the oil and gas potential of this area is rated as low). There are applications for water impoundments and hydropower development within this area. Before recommendations are provided on these applications, there will be further site specific environmental analyses that will be done with consideration of the direction within the Plan to protect and enhance wildlife habitat, visuals and high quality recreation. The Plan calls for management of that portion of the Clarks Fork River cooridor recommended for wild and scenic designation to maintain its eligability until Congress decides this issue.

FPD-151-P-L-C
Proj. No. Orig Type Affil

-2-

not issue permits for any dams along Sunlight Creek or Clark 's Fork. Continue to manage Clark's Fork for wild and scenic values. Consider designation of Chief Joseph Trail. No timber cutting on Little Sunlight Creek. (There was little discussion or description of this particular cut and though small, could have detrimental effect. **2**

004 Crandall 1:

Protect Cathedral Cliff's area, especially north side due to rare plant species as described by Wyoming Native Plant Society. (Is this area 006:). **3**

151-3 The Cathedral Cliffs area has been nominated as a Special Interest Area. It will be managed as such while a final establishment report is being prepared.

020 Sunlight Trout Peak:

Close roads on upper Sunlight due to critical wildlife habitat and opportunity for pristine recreation, etc. Timber cuts are ungightly and roads increase opportunity for poaching, and off-road vehicle use. This will undoubtedly increase as Sunlight becomes more and more popular due to road paving and increased population. The Hardee timber sale should be abandoned. The Beem Gulch sale needs closer examination as I question effects of two more miles of road. Mining impacts need discussion as this activity would be exceedingly harmful. **4**

151-4 The roads will be single purpose roads for removal of timber and then closed to public use following timber activities.

025: Beartooth Highway:

No oil and gas leasing! **5**

151-5 Around 410 acres of land adjacent to the Bearthooth Highway is withdrawn from Mineral entry as a result of the Park Approach Act. In Grizzly Situation I areas no leasing is recommended until the population has recovered.

059 Francs Peak:

No oil and gas leasing, despite high potential at high altitudes. Restrictions on recent Gold Reef well were not sufficiently protective. **6**

151-6 There is no evidence that the recent Gold Reef Exploratory Oil well had significant adverse effects on wildlife populations, soil and water resources, or any other surface resource. The disturbed area will be entirely reclaimed in 1986.

Comment 151

FPD-151 P-L-C
Proj. No. Orig Type Appl

-3-

137 Deer Creek:

This is critical sheep habitat. No oil and gas leasing. Also, highly scenic residential area. Development should be restricted.

7

140 Green Creek:

Christmas tree sale would be acceptable but further road constriction and timber sale would impact preferred elk winter range and scenic qualities of wilderness type recreation area with immediate proximity to Cody. Existing road might be slightly upgraded for non-4-wheel drive vehicles as this area has valuable recreation potential due to trail over to the South Fork.

8

144 Hunter Creek:

No oil and gas leasing

9

148 Legg Creek

Congratulations on no mineral entry. Keep other areas consistent.

150 Logan/Gunn/Trout Creek

This area is magnificent wildlife range and entirely inappropriate for any timber sale, roads, snowmobiling. There are already too many motorized bikes battering the trails, disturbing cattle and wildlife. The fences need upgrading for improved grazing. Fence closing off upper Trout Creek to cattle should be strictly maintained.

10

VI-424

Forest Service Response

151-7 We agree that Deer Creek is crucial sheep habitat and the area is highly scenic. Proposed management activities are to protect these amenities. The decision to lease or not to lease any pending applications within this area will be addressed in the South Fork Lease Group Environmental Analysis.

151-8 The Forest Plan shows no extensive timber sales in the Blackwater Creek and Green Creek area. During the first decade the District plans to sell approximately 200 MBF of small Ranger Sales District-wide consisting of post and poles, fuelwood, thinning, house logs, salvage and personal use Christmas trees. The sales in the Blackwater and Green Creek areas will utilize the existing road systems and skid trails. No road construction is anticipated in the first decade.

151-9 The General Mining Laws guide what can or cannot be withdrawn from mineral entry and under what conditions. We direct your attention specifically to Plan, Chapter III in the blue pages under Mining Law Compliance and Administration (General Direction 1C and 2) and Minerals Management Oil and Gas and Geothermal (General Direction 1). All direction found under Minerals Management, supplemented by Plan Appendix K, is intended to protect existing and proposed uses of the land for other resources thereby avoiding the need for withdrawal. If exceptional situations arise, or existing direction is shown to be insufficient, the option of withdrawal remains.

Mineral operations are by law, a viable use of public land. Our charter, provided by Congressional action, is to manage first according to law, and not strictly according to variable market pressures. The mining laws stipulate that lease applications can be made and must be considered for lands not withdrawn. The Forest Plan was selected in large part because it allows mineral activities while recognizing and maintaining the values of clean water, stable wildlife populations, and recreation opportunities which are of primary importance to many Forest users. The Forest Plan affords adequate protection of popular recreation areas, critical wildlife habitat, and other such resource values through application of stipulations and recommended operating procedures. Protection may be in the form of seasonal restrictions or no-surface-occupancy stipulations (see Appendix K of the Plan).

One consideration here is that a lease may never result in actual drilling activity; historically, a low percentage of leases are explored or developed, due in part to market fluctuations and uncertainties.

151-10 Timber sales scheduled in the first decade in this area have been deleted from the final Forest Plan.

Fences in the area are continuing to be constructed and existing fences maintained. The management intent and emphasis is not to graze the Upper Trout Creek basin. Short range plans are for each Ranger District to conduct a minimum of two range analyses each year and two updated Range Management Allotment Plans. Based on allotment analyses, any major changes proposed to either reduce and/or increase domestic stocking and/or wildlife herd quotas on an allotment will follow prescribed Forest Service Manual procedures before implementation can take place.

Upper Trout Creek Basin is closed to domestic livestock grazing.

Comment 151

FPD 151 P - L - C

P O BOX 308

COD WYOMING 82414

-4-

153 Rattlesnake:

Public access in fifth decade should be questioned, due to private ranch situation. This is also a prime area for wintering elk and due to the narrow valley, there would be a serious disturbance to elk. There is already an access to Monument Hill, which could be improved.

156 Valley:

Due to sheep habitat and bald eagles, no oil and gas leasing.

157 Jim Mountain:

No grazing in upper Trout Creek basin. Cattle cause severe disturbance to fragile alpine terrain. This area should have been included in wilderness boundary. Oil and gas leasing and seismic blasting should be completely restricted.

159 North Absaroka:

This area has high recreation use. The plan made no mention of reservation system for certain ~~backgroun~~ backcountry campsites. Near Frost Lake, for example, campsites in July are impossible to find as users are backed up waiting to get into the Park. This problem needs to be remedied.

Thanks for the opportunity to comment.

Sincerely,

Anne Model

Forest Service Response

11 151-11 Fifty years from now, we do not know what the demands will be for timber and public access. However, we do know that just population increase over time will create more demand in these areas. If public access is needed in the fifth decade, good road management, restrictions, seasonal closures, and enforcement could mitigate impacts to wildlife. See also response to comment 136-6.

12 151-12 See response to comment 151-9

13 151-13 See response to comment 151-10.

14 151-14 Seismic operation on Jim Mountain are guided by the 1984 "Geophysical Investigations for nonwilderness and nonprimitive areas on the Shoshone North Fork".

15 151-15 See response to comment 129-2.

RECEIVED OCT 5 1985

FPD-152-P-L-B
Proj. No. Orig. Type Acct

SEVEN D RANCH

P.O. Box 100
Cody, Wyoming 82414

Winter: (307) 587-9885
Summer: (307) 587-3997

October 2, 1985

Mr. Stephen P. Mealey, Forest Supervisor
Shoshone National Forest
P.O. Box 2140
Cody, Wyoming 82414

Dear Mr. Mealey:

I appreciate this opportunity to review and respond to the proposed Forest Plan which is to be used as a guide for management of the Shoshone National Forest during the next fifty years. This plan does have merit, and I commend you and your staff for your efforts to date in its development.

As a taxpayer and citizen, and as the managing partner of the 7 D Ranch, which is bordered on three sides by the Shoshone National Forest, I feel I do have a vested interest in the direction the management of the Shoshone is to take.

I specifically endorse the recommendation in The Plan to continue to manage approximately twenty-two miles of the Clarks Fork River and Clarks Fork Canyon as an entity eligible for the Wild and Scenic River status it deserves. 1

I also endorse the recommendation which would withhold wilderness areas and critical grizzly bear habitat areas from oil and gas development. I believe that this particular recommendation could be improved upon by adding an additional one mile "buffer zone" to existing wilderness areas and Situation I Grizzly Bear Habitat, and that no dam sites, no additional road construction, and no oil or gas development be permitted within that buffer zone. 2

As regards timber harvest, it is evident that the levels of harvest, especially in Sunlight Basin, will be much increased. If my memory serves me, in the area described as BASIN 002, very few timber harvest sales, and none of any size has occurred in the twenty-five years prior to the recent sale at Spring Creek. As I recall, some logging was done at both Beam Gulch and Strawberry Creek some years ago, but certainly no improved roads were built until the recent sale at Spring Creek in Upper Sunlight in 1982. That road was a real mistake: environmentally it was an intrusion on prime wildlife habitat, aesthetically it is a scar on the land, and financially it was a waste of taxpayers' money since the old road was an adequate transportation route.

I am appalled to see that further road construction is planned in the next ten years at Hardee Camp in Upper Sunlight in 1991, at Company Creek in 1992, at Trail Creek in 1993, and at Beam Gulch in 1994. In addition, more roads in the areas near Sunlight Basin are scheduled at Lodge Pole, Reef Creek, Jim Smith Creek by the 94, the Beartooth Highway, Paint Creek, Russell Creek, Ghost Creek, and Dead Indian Gulch. I note there is no road construction or reconstruction scheduled for the Gravel Bar sale in 1994, but I ask you how that sale could take place without building a river crossing and reconstructing at least some of the old road? 3

I should clarify my stance on timber harvest and road building. I believe that timber harvesting, done with good planning and care, may be environmentally, aesthetically, and even financially beneficial to the Forest. I do <u>not</u> believe that newly constructed roadways such as are presently being built into previously roadless areas are at all beneficial. I have spoken on numerous occasions about road building to Mike Hanson and Van Largent of Cody Lumber, Inc., the firm which has done the majority of logging in this area. They have repeatedly told me that they <u>do not need</u> the improved roadways which the Forest has had them build. They can get their logging done without developing elaborate roads.

152-1 The Proposed Plan incorrectly states that we can apply for an extension of the protection period for the River. It is contingent upon an act of Congress to protect the River either by including it in the Wild and Scenic River System or by providing additional temporary protection. It is uncertain at this point whether the Clarks Fork of the Yellowstone River will become a part of the National Wild and Scenic Rivers system. The Forest Service and the Administration are in favor of the River's inclusion. Management activities that are within the discretion of the Forest Service will be designed to maintain the River's eligibility. Other activities that are presently within the discretion of agencies such as BLM (minerals) or Federal Energy Regulatory Commission (hydropower development) could affect eligibility characteristics of the Clarks Fork. In the event such developments are proposed, we would recommend denial to the appropriate agency, until Congress acts. See also response to comment 97-1a.

152-2 See response to comments 51-3, 68-8, and 35-4.

152-3 Implementation of standards and guidelines contained in the Plan will ensure compatibility between timber and other resources. Monitoring requirements as discussed in Chapter IV of the Plan will assist in evaluating the effectiveness of standards and guidelines in achieving desired Forest conditions.

FPD-452 - P - L - B

It has been argued that the effects of building roads for logging may be mitigated by road closures once the logging is completed. I would like to point out that traditionally road closures in this area have not been very effective. I have observed that "Road Closed" signs in such places as Painter Draw, Trail Creek, and Strawberry Creek have been torn out by trespassers year after year, particularly during the hunting season, and they are replaced year after year by the USFS field crews. Even physical barriers are not enough to stop people from riding their trail motorcycles and all-terrain vehicles past road closure signs, and that they seem to love to do. 3

Furthermore, I believe timber harvest techniques need to be more closely monitored than they have been in the past. The piles of "slash" at the Spring Creek sale, for instance, contain so much rock and dirt with the actual slash that they will remain as unsightly mounds of trash for years to come unless someone is compelled to clean them up. I believe the sale of timber should be contingent upon thorough and prompt cleanup of previous sales.

As to the Forest Plan itself, I believe it needs to be far more detailed if it is to carry any real weight. I was amused and somewhat alarmed yesterday in speaking with Tom Mitchell, mastermind of the Plan, to find out that he could not figure out any better than I where exactly those roads at Hardee, Trail Creek, Company Creek, and Beam Gulch were to be built. He could not find an overlay or map in the office which described those roadways. That does not speak well for the Plan. Another area lacking in detail is that of trail reconstruction and maintenance. Some mention is made of this, but no specifics about trail maintenance are drawn out that I could find. More detail needs to be spelled out in each of the many facets of the multiple use scheme in order for this Plan to benefit the forest managers and the general public.

In addition, this Plan in general could be more useful if it included a more complete overview of the entire Shoshone National Forest and its related Greater Yellowstone ecosystem. For instance, the management of grizzly bears in Sunlight Basin affects and is affected by the management of the bear in the entire ecosystem. To be more specific, Sunlight and Crandall Creeks comprise a large portion of the best grizzly habitat in the region or ecosystem. To quote the Plan for 002 - BASIN: "5550 acres of grizzly bear Situation I habitat is to be managed using the Grizzly Bear Guidelines." It should be pointed out that building new roads in Situation I grizzly habitat is not consistant with the Grizzly Bear Guidelines. If it is necessary, in addressing the multiple use concept, that more roads be built on The Shoshone National Forest, then those roads should be concentrated in areas away from wilderness and away from Situation I grizzly habitat. The overview needs to be kept in mind as each management decision is made in the Plan. 5

Finally, an important category, that of historic and archeological sites, has been completely disregarded in this Plan. It is interesting to note that in Sunlight, for instance, two important archeological sites are located in the same spot as two USFS campsite / trailheads, those being Dead Indian Campground and Little Sunlight Trailhead. Recognition of and protection for these and other archeological sites should be provided if this Plan is to be complete. The only item which I could find in the Plan which comes close to this category is mention of designating a trail as the historic Chief Joseph Trail. I wonder, can anyone document which trail he actually used? (Please do not let that question stop you from designating your trail as historic.) 6

I thank you again for this opportunity to comment, and I wish you well in your next step of developing the "Final" management plan.

Sincerely yours,

Marshall W. Dominick

Marshall W. Dominick

VI-427

Forest Service Response

152-5 The Grizzly Bear Guidelines do not prohibit road construction in Situation I. Also see response to comment 6-5, 22-5 and 24-1.

152-6 Cultural Resource evaluation and protection is emphasized (see General Direction, Plan page III-21). The program will include coordination with other federal and state agencies to assure that specific areas, such as the South Pass City area, are adequately protected. A full-time archaeologist now has responsibilities for National Forests in Wyoming. Each Forest has paraprofessionals responsible for cultural resource inventories. The Warm Springs Flume is an inventoried cultural resource site and it will be protected as such on both the Forest and neighboring lands administered by the BLM.

Comment 153

Forest Service Response

RECEIVED OCT 3 1985

FPD-153 W-L-C
Proj. No. Orig Type Affil

Andrew M. Bryson
P.O. Box 336
Laramie, WY. 82070

Comments on Shoshone National Forest Draft Plan

Timber: I oppose any proposed timber sale in the Tibb's Butte area. This area should be managed primarily for recreation and wildlife. And generally timber sales should be planned to enhance wildlife habitat. | 1

153-1 There is no timber scheduled in the Tibbs Butte area. The vegetative manipulation indicates either aspen or sage treatment.

Roads: The Forest Service should continue to manage the road system so that wildlife and soil are not adversely affected. And any new roads should have restricted access in order to manage in favor of wildlife and recreation primarily. | 2

153-2 Seasonal road closures, particularly in the Spring will prevent disruption of the elk migration and calving areas. Harvesting of elk in the Fall is controlled by limited permits issued by the Wyoming Game and Fish Department. Timber sale layout and road locations will be designed to provide escape and hiding cover for migrating elk with road closures implemented if needed.

Grazing: Allotments on the Beartooth Plateau should not be converted from sheep to cattle. And permittees should be required to keep their cattle on their allotments and pay additional usage if they do not. | 3

153-3 Should a conversion from sheep to cattle be proposed, implementation would only be done after an analysis shows that the range is suitable for conversion to cattle.

Fire: Where possible, wildfires should be let burn. This is especially true in wilderness areas, but also on other areas of the Forest in order to enhance wildlife habitat | 4

153-4 The importance of fire in its natural role in the ecosystem has been recognized, and the fire suppression guidelines in Appendix F of the Plan has been further liberalized between the proposed and final Forest Plan.

Comment 154

Forest Service Response

FPD-154-0-L-0
Proj. No. Orig Type Appl

United States Department of the Interior
OFFICE OF THE SECRETARY
OFFICE OF ENVIRONMENTAL PROJECT REVIEW
Denver Federal Center, Building 67, Room 488
P.O. Box 25007
Denver, Colorado 80225-0007

IN REPLY REFER TO

October 25, 1985

ER 85/1419

Mr. Stephen P. Mealey
Forest Supervisor
Shoshone National Forest
P.O. Box 2140
Cody, Wyoming 82414

Dear Mr. Mealey:

We have reviewed the proposed Land and Resource Management Plan and draft environmental statement for the Shoshone National Forest, Park, Fremont, Sublette, Teton, and Hot Springs Counties, Wyoming, and offer the following comments.

General Comments

In addition to the 50-year timeframe, we recommend the Plan discuss, in greater detail, management direction for a shorter time period such as the next 10 years. With the status of forest uses changing significantly every year, it appears realistic projections for many uses can only be made for about a 10-year period. 1

Many of the discussions of actions in the alternatives seem to be based on the use of trends to define the current management situation instead of a finite figure or value for current management. The result of this is that alternatives are shown to have less of an effect on particular resources when in fact they are increasing impacts.

Fish and Wildlife Resources

Throughout the life of the Plan, human population centers will presumably continue to grow and private lands adjacent to the Forest will continue to be developed. It is our belief that the public value of some forest-based resources and opportunities will continue to increase as they become more scarce in the private domain, and we urge that a primary consideration of future Forest management be in watersheds, recreation, and wildlife. Activities like timber harvesting, energy development, and grazing should be compatible and complementary.

The Forest Service's responsibility under Section 404 of the Clean Water Act is acknowledged on page III-241 of the Plan within the context of standards for constructing impoundments (under Prescription 9E: Water Impoundment Sites). We recommend that similar standards be included for several Management Activities listed under Prescription 9A (Riparian Area Management), since Corps of Engineer 404 permits may be required. Specifically, we believe that a similar standard should be added to General Directions 5 and 7 of Management Activity: Water Resource Improvement and Maintenance (on pages III-230 through -233 of the Plan) and to General Direction 3 of Management Activity: Mining Law Compliance and Administration (on pages III-235 of the Plan). 2

VI-429

154-1 Wording has been added to the introduction to each document to clarify the timeframes considered in planning process.

154-2 Most Forest Service activities in or adjacent to streams are permitted by the Nationwide 404 permit which stipulates a maximum of 200 cubic yards of material deposited in a floodplain. We routinely notify the Corps of Engineers of any activity covered under this general permit. Please note that there is direction in the blue pages under Riparian Area Management, General Direction 6, that effectively prohibits such activities that would require a 404 permit. Similar direction is provided in Management Prescription 9A under Mining Law Compliance (standards and guidelines for General Direction 1), Transportation System Management, and Local Road Construction and Reconstruction.

Comment 154

FPD-154-0-L-G
Proj. No. Orig Type Affil

Mr. Stephen P. Mealey 7

We note (DEIS, p. III-52) that Forest water program goals "are not being met" under current budget levels, and that "Lower funding is likely to occur regardless of the alternative which is implemented eventually." (p. IV-51). In view of these statements, the conclusion on p. IV-52 that floodplains and wetlands "will be protected in all alternatives" is unsubstantiated and appears unwarranted. The final EIS should fully analyze the magnitude and severity of effects to riparian/aquatic ecosystems, based on anticipated levels of funding. Moreover, we recommend that wetlands (as defined in section 2527.05 of the Forest Service Manual) and the riparian ecosystem be separately identified in the EIS as an "affected environment," and be explicitly discussed as such in appropriate sections. 3

Feedback gained as a result of monitoring activities will be essential in order to evaluate implementation of the Plan. Upon examination of the Monitoring and Evaluation Chapter (page IV-1 through V-9 of the Plan), we noticed that no costs associated with monitoring were included. The reason for this is not clear and we question whether the Annual Monitoring Program (page IV-1 of the Plan) is an adequate substitute vehicle for disseminating this information. The documents under review do not provide the public with any insight as to the scope of work required to perform the monitoring. Therefore, we recommend that the anticipated cost associated with monitoring each element be included in the Plan. 4

Threatened and Endangered Species

The Fish and Wildlife Service (FWS) concerns about threatened and endangered species in connection with the DEIS and Proposed Plan are not discussed herein. The Forest Service has initiated Section 7 consultations with the Endangered Species Field Office in Helena, Montana. Comments on threatened and endangered species will be provided through the consultation process. Consultation results should be included in the final EIS. 5

Mineral Resources

We found the subject documents to be comprehensive and informative; our following comments and suggestions are intended to help clarify and emphasize certain mineral related concerns.

Both the Plan and EIS allude to USGS Professional Paper No. 1300 (DES, p. III-58; PLRMP, p. II-64) for "Mineral Potential" information on wilderness areas, and to a "Mineral Potential Report for Shoshone National Forest" by John S. Dersch of the U.S. Forest Service, for details on mineral occurrences and potential of the Forest (DES, p. III-58). The USGS report is difficult to use in conjunction with the Forest reports because it does not indicate all current wilderness area names and designations. The Dersch report is a comprehensive and informative document, but it is missing the "Mineral Potential Overlay" map for the Forest (available from the author), and is inappropriately located within the DES as a subpart to Appendix D (Oil and Gas Valuation Procedure). 6

Referenced reports, such as USGS Professional Paper No. 1300, that do not agree with Forest place-name data, should be brought into agreement by text notation or footnotes to alleviate reader confusion. Further, details pertaining to mineral resources or mineral potential of wilderness areas, or to the Forest as a whole, should be addressed in appropriate chapters of the DES and the Plan, rather than by reference to documents outside of the Forest reports.

Forest Service Response

154-3 We appreciate your careful reading of the documents and agree that funding is a critical element in making progress toward a number of the objectives set forth in the Plan. A major difference between this Forest Plan and other plans or activities conceived in the past is that water quality and wetland values are brought up front to stand beside other traditional Forest objectives. We expect that, regardless of the overall funding level, the percentage of dollars or efforts for these values will increase relative to traditional emphases (e.g. timber, roads, range). Wetlands and floodplains will be separately identified throughout the FEIS as suggested.

154-4 We agree that monitoring of Plan implementation is critical and that this feedback loop needs to be provided so that management of the Forest can be adjusted as needed. Such direction is in the regulations governing land and resource management planning (36CFR219). There has recently been much effort given by the Forest Service in general to the subject of monitoring and implementation of Forest Plan. These efforts have resulted in Supplements to the Forest Service Manual. Discussion of the planning regulations and in the Supplements has been added to Plan, Chapter IV. As stated in Plan, Chapter IV, details of monitoring are included in the documents incorporated by reference. All such documents are available for review by the public. It is just not possible to incorporate all details of monitoring into Plan, Chapter IV.

When things do not go according to plan, an evaluation will be made as to the seriousness of the deviation. When new information is obtained, the significance of that information as it relates to management of the Forest is evaluated. In cases such as these, response will be taken as appropriate ranging from no response, to issueing a Plan amendment, to completely redoing the Plan.

The Plan is to be in essence a "contract with the public" stating that this is how we are going to manage the Forest for the next 10-15 years barring arrival of significant new information. One purpose of planning is to reduce the ability of individual civil servants to change the intent of the Plan towards their personal philosophy. It is up to the Forest Service internally and the public to see that the Plan is followed or changed to meet needs by appropriate processes.

Most of the money spent in monitoring is included in the "program management" for each resource. This includes keeping resource records, evaluation of standards and guidelines to determine adequacy, and carrying out the monitoring as spelled out in Plan, Chapter IV. The money listed for monitoring in Appendix J is slated for monitoring specific projects rather than for a resource program in general.

154-5 Results of formal consultation with the U.S. Fish and the Biological opinion is included in Appendix H of the Plan.

154-6 The "Mineral Potential Overlay" was published at the back of Appendix D in the DEIS. If your copy does not contain this map, we regret the publishing error. It seems logical to us to include this report in Appendix D along with the minerals valuation procedure, which incorporates minerals potential. Please note that in each analysis area presented in Appendix J of the Plan, a discussion of minerals potential is given where appropriate. The Final Plan document includes in Appendix J each entry a more thorough presentation of minerals potential and leasing availability.

FPD-154-0-L-G
Proj. No. Orig Type Appl

Designated wilderness areas in the Shoshone National Forest comprise about 1.4 million acres (PLRMP, preface p. iii; DES, p. III-29, p. IV-70), or nearly 57 percent of the forest. Except for valid existing rights, wilderness lands are withdrawn from mineral location and leasing. "Approximately one-quarter of the Forest is estimated to have high to moderate potential for locatable minerals" (Summary Report of DES and PLRMP, p. 45; DES, p. III-58), but the reports fail to indicate the availability of these lands to mineral entry. The mineral potential overlay map that should have accompanied the Dersch report clearly shows where these potential areas are; close comparison of this map to the "Analysis Areas--Plan Detail Map" (PLRMP, pocket) reveals that nearly all the areas estimated to have high to moderate potential for locatable minerals (25% of the Forest) are withdrawn from mineral entry by the Washakie Wilderness designation. Most of the Forest, not in Wilderness, is available to mineral leasing. The only statement made in regard to the Forest's potential for leasable minerals is in reference to the Greybull District's high potential for leasable minerals and its poor suitability to surface occupancy (DES, p. IV-60). We believe that an assessment of Forest plan impact on mineral resources should include a comparison of land "availability" to land "mineral resource potential." 6

The Plan and EIS do not appear to recognize minerals as a valuable natural resource on equal footing with other resources. Generally, whenever minerals are mentioned, it is in the context of its potential conflict with other resources. We suggest you upgrade the treatment of mineral resources, particularly oil and gas, in both the Plan and EIS. 7

Oil and Gas

The Plan and EIS reflect a great deal of effort. We compliment the authors on their application of RMOGA's oil and gas evaluation process. This is the first time we have seen it used and it helps to evaluate oil and gas potential relative to other resources. Having said that, we believe the explanation and application of the process are very difficult to follow as presented. We recommend another effort be made to explain it. 8

Guidance appears somewhat general as to what stipulations to apply for certain parts of the Forest. For example, Appendix K to the Plan lists the types of operating provisions which might be selected, but these are very broad. Our concern is that some Districts might be overly protective of nonmineral resources while others might assume a development-oriented attitude. 9

In BLM, the "No Surface Occupancy" stipulation is used in lieu of "No Leasing" to prevent disturbance. No leasing is only used where areas are closed by legislation, regulations, withdrawal, formal Departmental policy (i.e., wildlife refuges), or where off-lease drilling might harm the public interest (i.e., directional drilling weakening a dam). The advantages to issuing a lease are that the Government receives revenues and drainage is prevented. It appears that the Plan uses no leasing in situations where no surface occupancy would accomplish the same results. 10

The Plan and EIS utilize a number of complex analyses and Government terminology which are difficult for the lay reader to understand. It is recommended that the explanations of the various analyses and terminology be simplified.

The EIS needs to estimate the magnitude of impacts to other resources from mineral development. It is difficult to weigh impacts versus benefits when only general statements such as "minerals development would create negative impacts" are made. 11

154-7 It is unfortunate that your comment does not provide specifics in regard to this perceived bias. As you note in the following paragraph, (154-8), the Shoshone National Forest is the first and only Forest to attempt use the RMOGA valuation process. This is contrary to the alleged bias indicated above.

We refer you to the discussion of issues and concerns presented in Chapter 1 of the EIS. As you know, scoping and the issues derived there from are the basis for all analysis. Planning problem 11, dealing with minerals, resulted from considerable concern in regard to the effects of minerals activities, particularly oil and gas, on other forest uses or resources. Therefore, the discussion of minerals and its potential effects on forest resources such as wildlife habitat, water quality and recreation opportunities is appropriate and necessary according to NEPA procedures. This is no different than the presentation of effects from timber harvest or range management.

154-8 Appendix D of the EIS received a few minor edits but we were unable to do a major rewrite as requested in time for publication. We will attempt to clarify this explanation.

154-9 Some flexibility must remain in any process to take account of new data relating to any proposed activity. Our intentions regarding the application of lease stipulations for given management considerations (See Appendix K Tables) follow primarily from legal requirements. Any lease specific or site-specific recommendation can proceed only from additional environmental analysis that more precisely defines the management considerations in an area.

154-10 We are unaware of the source for your concern. All nonwilderness lands on the Shoshone National Forest are available for leasing with the exception of Grizzly Situation 1 habitat outside wilderness, wilderness study areas, and other "classified areas" such as those noted in your comment. The availability of lands for oil and gas leasing is clarified in Chapter IV of the FEIS under Minerals.

154-11 Within the scope of this EIS, we are unable to estimate, quantitatively, the magnitude of impacts from activities that are defined neither site-specifcally nor in terms of intensity or duration. On the other hand, the EIS does explain subjectively and precisely the effects of oil and gas on other resources in Chapter IV under minerals. This lengthy discussion supports the general statement, taken out of context, "minerals development would create negative impacts".

Please refer to Plan, Appendix K and note that future leasing activities and operations proceeding from them are to be subjected to additional environmental analysis. This analysis will estimate the magnitude of impacts either through risk analysis or with the knowledge of specifics regarding location, discovery probability, production values, duration of impact, and other local resource data.

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Mr. Stephen P. Mealey 4

Neither the Plan nor the EIS clearly portray any differences in oil and gas production among the alternatives. Restrictive stipulations will affect exploration and thus potential for production. 12

Water Quality

Monitoring of ground water should be addressed, particularly potable water supplies for the visiting public and for the staff. The Plan recognizes that commodity-oriented activities on the Forest can result in significant lowering of water quality; however, it is stated that effects of oil and gas pre-exploratory drilling or seismic activity use are expected to be of short duration. Improperly abandoned drillholes, such as seismic shotholes, seismic velocity testholes, stratigraphic testholes or unproductive oil-testholes can allow contamination of freshwater aquifers or loss of artesian pressure through wild flows at the surface or into aquifers located above the source of the water. Improperly abandoned deep drillholes may yield brines or other mineralized waters to upper freshwater zones or to the surface. These impact potentials should be addressed more specifically with plans for mitigation. Disposal of formation water produced with oil and gas activities should be addressed. 13

Air Quality

In general, the organization and graphics of both documents provide much assistance to the reader searching for specific information. However, the discussion of Air Quality Areas (as defined by the Clean Air Act) in both documents alludes only vaguely to those areas of the forest with Class I designation. We suggest that either a full verbal description or a map be provided outlining which are Class I and which are Class II. If the only Class I Air Quality Area is in designated wilderness, the Plan/DEIS should so state. 14

Recreation

The Summary of the DEIS and Draft Forest Plan states on page 15: "This alternative would provide sufficient amounts of different types of recreation opportunities to satisfy demand on each Ranger District." On page III-311 under Recreation Site Construction and Rehabilitation, the draft Plan states that the Forest Direction is to "provide appropriate development facilities where the private sector is not meeting the demand." We support the idea of meeting demand, but would ask that any changes in North Fork camping capacity be coordinated with Yellowstone National Park. Because camping areas in Yellowstone are often filled to capacity by midday during the peak season, campsites along the North Fork are important to visitors approaching Yellowstone from the east. These sites provide an overnight stop close enough to the park so that visitors can obtain campsites in the park on the next day. (The term "bedroom," used on page 40 of the Summary is misleading as it implies that North Fork sites might be used as a base camp for a Yellowstone visitor's entire stay, which we do not believe is the case.) During years of high visitation, these sites are filled to capacity and additional capacity could be used. Since Yellowstone's carrying capacity has not been determined, we believe the option of increased capacity in the North Fork Corridor should be available, should such high levels of visitation be reached on a regular basis. 15

Forest Service Response

154-12 The estimation of production potentials is beyond the scope of this EIS and Plan. The potential map is very general, and in terms of high, moderate, low or unknown rather than production rates. Information that could allow the building of a set of assumptions for this purpose is proprietary and not available to us. In our opinion, restrictive stipulations may or may not affect exploration and the affect on production remains to be seen since there are and have been no production wells on the Forest.

154-13 Potable water supplies on the Forest are routinely sampled, with results reported to the State of Wyoming. The Forest adheres to guides presented in Forest Service Handbook 7409.11 (Sanitation Engineering and Public Health) relating to sanitation, water treatment and supply, and solid wastes. All such handbooks are incorporated into the Forest Plan, and there is no necessity to repeat this material in the Plan document.

The potential effects of pre-exploratory drilling and seismic activities were evaluated in the 1984 EA, Geophysical Investigations for Nonwilderness and Nonprimitive areas of the Shoshone National Forest. The Plan recognizes that commodity-oriented activities can result in significant lowering of surface water quality, but that effects of shothole drilling and seismic activity on groundwater is expected to be of short duration. We agree with your statement regarding potential affects of improperly abandoned or cased holes. The discussion on this in the DEIS will be expanded in the FEIS under Chapter IV, Minerals, effects on water.

154-14 We feel that the presentation of Air quality classes in Chapter II of the Proposed Plan (page II-78) and Chapter III of the DEIS (page III-72) are neither vague nor incomplete. The first sentence under Class I Air Quality Areas states that wildernesses are Class I. There is no reference to anything other than wilderness as Class I. The second sentence under the heading Class II Air Quality Areas says quite plainly that all areas outside of Class I are Class II. We refer you to the section in the EIS, Chapter III, entitled Wilderness, and to the maps thoughtfully provided in the envelopes on the back cover. These maps indicate what is wilderness and what is not.

154-15 Given currently available projections of demands and past use records for developed recreation areas, the Plan does provide enough capacity to meet demands. As stated in Chapter IV, as implementation of the Plan occurs, there will be a need to amend it based on changing circumstances. Such changes could include increasing developed recreation capacity on the Forest to meet demands of visitors to the National Park once the National Park calculates its capacity and identifies such a need. At that time, there will be a new analysis to identify the best way to meet this need within the philosophy of the Forest Plan.

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Wild and Scenic Rivers

We support those steps taken by the Forest Service to secure designation of the Clarks Fork of the Yellowstone as a wild river. **16**

154-16 The Proposed Plan incorrectly states that we can apply for an extension of the protection period for the River. It is contingent upon an act of Congress to protect the River either by including it in the Wild and Scenic River System or by providing additional temporary protection. It is uncertain at this point whether the Clarks Fork of the Yellowstone River will become a part of the National Wild and Scenic Rivers system. The Forest Service and the Administration are in favor of the River's inclusion. Management activities that are within the discretion of the Forest Service will be designed to maintain the River's eligibility. Other activities that are presently within the discretion of agencies such as BLM (minerals) or Federal Energy Regulatory Commission (hydropower development) could affect eligibility characteristics of the Clarks Fork. In the event such developments are proposed, we would recommend denial to the appropriate agency, until Congress acts. See also response to comment 97-1a.

National Natural Landmarks

There are several proposed National Natural Landmark (NNL) areas in the Shoshone National Forest, all in Park County, Wyoming. They are:

Abiathar Break-away Fault
Beartooth Butte
Beartooth Pass
Beartooth and Line Creek Plateaus
Deep Lake Landslide
Hurricane Mesa Ring Dike
Peatbeds
Twin Lakes
Wapiti Valley Dikes

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There is no mention of NNL's - proposed or established - in either document. Further planning for the Shoshone National Forest should take into account these proposed designations and avoid impacts that could adversely affect the outstanding ecological and geological features of these areas. Information on the NNL program and specific information on the above-named proposed NNL's may be obtained from Ms. Carole Madison, Rocky Mountain Regional Office, National Park Servic, P.O. Box 25287, 655 Parfet Street, Denver, Colorado 80225, telephone, (303)236-8699 or (FTS)776-8699.

154-17 During implementation of the Plan, there is the flexibility to amend the Plan based on propossals including propossals for the establishment of National Natural Landmarks. Some of the proposed NNLs listed are currently being recommended a RNAs. Most of the other areas are within wilderness, therefore management of these areas will protect their eligability until a formal propossal and eligability report is completed.

Yellowstone National Park

The greatest challenge now facing land managers in the greater Yellowstone ecosystem is integrating a variety of Agency mandates and public needs. The National Park Service's primary concern in the area is to ensure the welfare of Yellowstone National Park, and to be watchful of management actions taken for lands outside park boundaries which could impair the Park's ability to meet legal obligations in protecting Yellowstone resources. It is well known, for example, that external actions, beyond the administrative control of the National Park Service, could adversely affect efforts to protect the grizzly bear, maintain a healthy elk population, or perpetuate naturally-occurring levels of geothermal activity in the park. **35**

154-35 See response to comment 24-1.

The proposed Plan accommodates many uses and interests in the Shoshone National Forest. We recommend that as a part of the multiple use concept, provision for uses compatible with the management of Yellowstone National Park be incorporated into the Plan. The Park is an International Biosphere Reserve and a World Heritage Site; these designations add emphasis to the need to manage the resources of the Yellowstone area as an ecosystem rather than dividing the region into disjunct management units.

Wind River Indian Reservation

The Forest is located adjacent to the Wind River Indian Reservation at several locations, impacts of any of the alternatives will be recognized on the reservation. In this regard, we suggest that the Forest Service effect consultation and coordination with the Shoshone and Arapahoe Tribes as soon as possible. **18**

154-18 The Forest took appropriate steps to inform and consult with the Indian Reservation, initially through the scoping process then through document mailings and informal contacts. See Chapter VI, Consultation in the EIS.

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The Wind River Reservation, for the past several years has harvested relatively small amounts of timber. However, the resource does warrant the sale of substantial amounts of timber. It should, therefore, be recognized that any increase of timber harvest adjacent to the reservation has the potential to devalue or suppress reservation sales. **19**

154-19 No increase in timber harvest adjacent to the reservation is anticipated.

Any road and trail construction near or adjacent to the reservation for recreation, mining and timber harvest may adversely affect the cultural resources, increase incidence of fire, and cause hunting/fishing trespass on the reservation. These potential problems should be recognized and alleviated prior to further approvals by the Forest Service. **20**

154-20 As stated in Appendix J and Chapter III of the Forest Plan, implementation of all projects will require environmental analysis including scoping and determination of effects.

Specific Comments

Additional specific comments on the draft environmental statement are appended to this letter.

Sincerely,

Robert F. Stewart

Robert F. Stewart
Regional Environmenal Officer

Enclosure

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SPECIFIC COMMENTS - DRAFT ENVIRONMENTAL STATEMENT

p. II-21 - Define "minimum acceptable standards." 21

p. II-23, Expected Future Condition - Would not mineral production be decreased with more restrictive stipulations? 22

p. II-26, Alternative F - Does this alternative require mineral production? 23

p. II-35 - It may be impossible to maintain existing livestock numbers and improve condition or increase capacity. Many areas are overstocked and grazing systems and range improvements may not achieve the same results as lower numbers. 24

p. II-46-48 - It is difficult to distinguish differences in potential oil and gas production among these alternatives.

p. II-49-61 - Potential oil and gas production should be listed in these tables. 25

p. II-63, 4th para. - Explain what type of air pollution is anticipated. 27

p. II-67 - This discussion is difficult to follow. If you could tell the reader what the objectives of the discussion are it would help. 28

p. II-78, 80-84 - Table II-15 and its explanation are less than self-explanatory. 29

p. III-73 - The statement "In 1979, the Heritage Conservation and Recreation Services (HCRS, whose functions are now part of Department of the Interior) began . . . " should be reworded. HCRS was, itself, an agency of the Department of the Interior, ands its functions were transferred to the National Park Service. Similarly, the statement that "unless the Forest applies for an extension" should be deleted; there is no provision for such actions under the Wild and Scenic Rivers Act. 30

p. IV-56-57 - Acreages of various restrictions should be displayed. 31

p. IV-56-63 - The magnitude of impacts from mineral development is poorly estimated. This makes it difficult to weigh impacts against benefits. 32

p. IV-61, 1st para. - Quantify the risk of impacts to water. There are data available to indicate frequency of spills and other undesirable events. 33

p. IV-62 - H_2S should be included in the table. 34

154-21 Wording has been changed to "minimum legal standards".

154-22 Not necessarily. Mineral production is a function of production potential, location, and the willingness of industry to pay for or implement recommended mitigation practices in sensitive areas. Please see also the response to comment 154-12.

154-23 No minerals production targets are set by RPA.

154-24 Forest-wide livestock numbers can be maintained. Individual allotments may need to be reduced initially to provide for range recovery in problem areas. Improved grazing systems, management and structural and non-structural improvements will all be employed to maintain and improve range conditions and capacities.

154-25 See response to comment 154-12.

154-27 The DEIS provides more detailed discussion of effects in Chapter IV; Chapter II is intended to be a summary discussion. Please see Chapter IV, Minerals, effects on air. At your request, additional discussion is provided in FEIS, Chapter II on this subject.

154-28 The introduction to this section has bee modified.

154-29 A reference to Appendix B of the EIS has been added.

154-30 Wording has been changed accordingly.

154-31 The computation of acres available for leasing is presented in Chapter IV of the FEIS, in the Minerals section. The attachment of restrictions (in the form of stipulations) to leases is guided by Plan, Appendix K. Analysis area discussions in Plan, Appendix J focus in more detail (in terms of acres) upon local, specific management concerns that will be addressed by various approved special lease stipulations. See also responses to comments 154-9 and 154-10.

154-32 See the response to comment 154-11.

154-33 We will attempt to provide a discussion of risk to water quality from hazardous material spills. Other risks are not easy to quantify, in relation to nonpoint sources of pollution and cumulative effects. The criteria which are set out in the Final Plan, Appendix K, for water and soil hazard identification will aid in risk analysis of site specific proposals.

154-34 H_2S would fall into the category of ambient air pollutants in the table, and possibly into the odor category. H_2S is mentioned in the narrative on the following page. Additional discussion is presented in the FEIS.

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Forest Service Response

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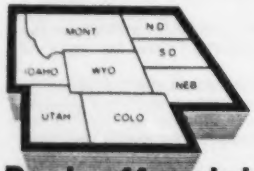

Rocky Mountain Oil & Gas Association, Inc.

345 PETROLEUM BUILDING • DENVER, COLORADO 80202
303/534-8261

September 30, 1985

Mr. Stephen P. Mealey
Forest Supervisor
Shoshone National Forest
P. O. Box 2140
Cody, WY 82414

Dear Mr. Mealey:

I am writing on behalf of the Rocky Mountain Oil & Gas Association, also known as RMOGA. RMOGA is a trade association of hundreds of companies and invididuals engaged in oil and gas exploration, production, and transportation activities in the Rocky Mountain area. Because federal land ownership is so significant in this area, we are extremely concerned with the federal land management planning process as it affects oil and gas activity.

We appreciate the opportunity to review and comment on the Shoshone National Forest Draft Land and Resource Management Plan (LRMP) and Environmental Impact Statement (EIS). You and your staff should be complimented for a technically outstanding job done in preparation of the Draft Plan/EIS. The analysis and display techniques used in the Shoshone draft are among the most sophisticated we have seen in Forest plans to date. Unfortunately, despite the professionalism demonstrated in the technical aspects of the documents, the Plan's bias against oil and gas activity is obvious.

The Plan's bias against oil and gas activity is demonstrated clearly in Appendix D of the DEIS. Under the Preferred Alternative, a total lease value for the decade is estimated at $80.3 million. This figure represents a 36% or $45.7 million reduction in lease value from the continuation of Current Management Alternative. Even more revealing is the fact that the Preferred Alternative is a 38% ($49.7 million) reduction from the RPA Alternative and a 41% ($56.7 million) reduction from the Commodity Alternative. While the dollar values assigned for the acreage may not be totally accurate (they may be too high or too low), the relationship of the various alternatives is an accurate illustration of the fact that the Plan's Preferred Alternative will substantially derogate the value of lands within the Shoshone National Forest for oil and gas purposes. 1

155-1 See response to comment 68-5.

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The Forest Service should reconsider the resource policies that would be advanced under this proposed Plan. The Forest Service is apparently "preserving the environment" regardless of the opportunity costs in not allowing oil and gas leasing. These lost opportunities include the forgone opportunity to discover domestic oil and gas resources which this represents. The royalties, tax revenues, contributions to national security, and balance of trade which would come from a significant discovery of oil and gas on the Forest are difficult to estimate, but they would indeed be substantial. The Plan does not, but should reveal that these benefits are above and beyond the estimated lease bid values reflected in Appendix D. Without such disclosure, the public could be led to believe that the only consequence of the Plan's restrictive management is the lost lease value. Lease values are rather insignificant when compared to the lost opportunity to discover oil and gas. This lost opportunity is the real consequence of the proposed management direction.

The prejudice against oil and gas is demonstrated in other ways as well. Under all alternatives, the Forest Service states that a total of 934,980 acres are available for oil and gas leasing. However, we note that this is not all leasing with surface occupancy: 549,000 acres are to be leased with No Surface Occupancy due to steep slopes, visual quality, water resources, and soil protection. This leaves a grand total of 385,980 acres available for leasing with surface occupancy. The Plan's proposed resource allocations for oil and gas do not meet the multiple use mandates found in the National Forest Management Act, as amended, and the land use planning regulations. The use of the same number of acres for each alternative also violates the National Environmental Policy Act (NEPA) and its implementing regulations, because the outcome is predetermined and there is no meaningful consideration of alternative resource allocations. 1

The Forest Service has an affirmative obligation to protect the surface resources. However, the law has never provided that this obligation necessarily precludes mineral activity such as oil and gas leasing. Nevertheless, this is the underlying premise that drives the allocations proposed in the Plan.

While examples of overly restrictive management and non-compliance with NFMA regulations appear throughout the Plan, we have identified several areas which warrant particular attention. These are described in detail below.

PLAN PLACES UNDUE EMPHASIS ON LOCAL INPUT

Page I-10 begins a discussion of Issues, Concerns, and Opportunities addressed during the planning process. Specifically, on page I-16, polarization is addressed alluding to the fact that some local entities are opposed to oil 2

155-2 The Forest Plan proceeds from Alternative D which is presented in the Environmental Impact Statement. The various alternatives were developed through a scoping process that included consultation with a variety of groups, including those affiliated with the oil and gas industry. (See Chapter VI of the EIS). The alternatives were evaluated through a social impact assessment that again included a variety of concerns, including oil and gas. Alternative D, which restrains oil and gas activities to a degree, was most acceptable in terms of resolving social conflicts (See Appendix F of the EIS). It was also among the most acceptable in terms of environmental effects (See Chapter IV of the EIS). In addition, our internal analysis of oil and gas as a valued resource was accomplished using a procedure that had the full support of our correspondents in the oil and gas industry (see Appendix D, EIS, Oil and Gas Valuation). Use of this procedure and how it was going to be displayed as well as a preview of the draft documents were done with regional representatives of this group. Input from this group was relied on as much as any other local, regional or national group.

The NEPA process does not try to determine which comments were more important than others, or determine which issues were emotional and which were fact. It simply takes the issues and developes a series of alternatives to include the issues raised in the EIS process. It is not a voting process. There is considerable polarization because of the many uses and many users of the Forest. Appendix F has dealt with the social impact analysis with the framework of the alternatives generated by the scoping process.

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and gas exploration. This polarization and the disproportionate reliance on local concerns has affected the social impact analysis. The NEPA process is not a voting one, yet the planning documents rely heavily on local input of special interest groups. We believe that the concerns of groups representing the oil and gas industry were considered as total numbers and not in light of the people and jobs these companies and trade organizations represent. Moreover, the Forest Service is required to review its issues on a national level as well as a local level. 2

PLAN IMPOSES AN UNJUSTIFIED REQUIREMENT OF NONMOTORIZED ACCESS

We see no indication in the plan as to where travel corridors occur or where roads will be allowed on the Forest. The Travel Management discussion addresses, in graph form (Figure III-4), the percentage of closure of Forest roads, but does not indicate where they occur. This is especially important in light of the Plan's direction for "isolated tracts" where oil and gas leases occur. The documents are permeated with the idea that helicopter mobilization is the answer to "isolated tracts" (apparently away from current or planned roads). In many instances helicopter mobilization, although an alternative which merits consideration, is not feasible because of altitude, or not justified in terms of environmental benefits gained when viewed in light of the increased costs. Other circumstances to consider are the availability of helicopters capable of moving drilling operations, availability of drilling rigs which are helicopter portable, and the economics of helicopter mobilization. Although helicopter mobilization was utilized in one instance as an experimental approach--the only time in the Rocky Mountains--it is being proposed as the cure-all for oil and gas exploration on the Shoshone National Forest. 3

In prescribing this extremely severe restriction on virtually every unroaded acre in the Forest, the Plan shows no evidence that the Forest Service has complied with IBLA mandates to consider less restrictive alternatives before deciding to impose stringent stipulations on oil and gas leases. This is contrary to BLM Instruction Memorandum 84-415 which states at page 2 that "the IBLA has upheld the Bureau's use of stipulations only when the record contains sufficient justification and indicates that less restrictive stipulations were considered but rejected as not serving to adequately protect the public interest". The widespread use of the "airlift or nonmotorized access requirement fails on both parts of this test. There is neither an apprent justification for this requirement nor any evidence that less restrictive alternatives were considered.

Forest Service Response

155-3 Isolated occupancy tracks are areas on the Forest where the soil and landform conditions can withstand normal oil and gas operations without exceeding minimum standards of soil and water resources, but which appear to be inaccessible. They are, in effect, islands where there is no reason torestrict surface occupancy on that particular area, but where there does not appear to be a way to construct a road to that area and still protect soil and water resources. If an area that is suitable for surface occupancy lies adjacent to other such areas and together they form a corridor to an existing road, then it was not considered an isolated tract. This is true even if there is no road in that corridor presently and regardless of the number of miles of new road construction necessary to connect that area to an existing road. In short, isolated tracks are areas where building a road to them using standard technology would violate soil and water minimums. If a road can be built to it, it is not "isolated".

The Errata Sheet to Appendix K of the Proposed Plan (which has been incorporated into Appendix K of the Forest Plan) describes how site specific environmental analysis fits into the leasing, exploration, development process. The process outlined calls for a site-specific examination of NSO areas to see if, in the context of a specific proposal, they are truly isolated. This process will be used to minimize any "lost opportunity to discover" by looking at ways to explore or develop without violating other resource standards. The discussion on isolated tracts in Appendix K has been modified to increase clarity.

The concern over isolated tracts has caused a wave of "helicopter paranoia". If after a site-specific analysis, the area is truly isolated, then helicopter access is presently the only means to access. Even the helicopter's tremendous expense, it may very well be cheaper than conventional road construction and subsequent obliteration provided that a road could be constructed without violating soil and water standards. In fact, Willie Legg of Marathon Oil, indicated that the helicopter show on the North Fork may have been cheaper than roading from an exploration standpoint. The fact that there are presently few rigs available that can be mobilized by helicopter would indicate that the current cost may be artifically high. If a demand is demonstrated additional supplies of these portable rigs will probably bring the cost down.

Individual management area prescriptions contain standards and guidelines dealing with transportation systems.

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We grant that the Forest Service is not formally bound by BLM Instruction memoranda, but they are bound by IBLA decisions regarding mineral leasing. Persistence by the Forest Service in recommending such stringent requirements with no apparent justification puts the Bureau in the difficult position of choosing between its historical deference to the Forest Service on stipulation recommendations and its obligations under the Mineral Leasing Act. So that the BLM can continue its policy of deferring to the Forest Service for stipulation recommendations, we urge the Forest Service to develop and document all of its stipulations (and particularly this one) in a manner that can be defended by the BLM before the IBLA. It is essential, at minimum, that a qualifying statement be included in appropriate sections of the Plan, including Appendix J, which says these requirements can be waived if it is found that helicopter access is infeasible or not justified in terms of environmental benefits gained when viewed in light of the increased costs to the operator, or that it would be possible to use motorized means. 3

PLAN EFFECTS AN ILLEGAL WITHDRAWAL OF GRIZZLY BEAR HABITAT

Grizzly bears, as a threatened species, are entitled to special management attention under the authority of the Endangered Species Act, 16 U.S.C. 1351, et seq. According to Section 7 of the Act, the objective of that special management attention is to assure agency actions are "not likely to jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of habitat which is determined by the Secretary . . . to be critical . . ." 16 U.S.C. 1536(a)(2). Under Section 7, when an agency proposes an action which it determines may affect a listed species or its habitat, that agency requests consultation with the Fish and Wildlife Service to determine whether the action will jeopardize the species or adversely modify the habitat, and if so, whether the proposed action could be modified to eliminate such consequences. 4

In this case, however, the Forest Service has circumvented the purpose of consultation by deciding not to take any action regarding oil and gas leases in areas they have determined to be Situation I habitat. Put another way, the Forest Service has decided as a matter of fact that oil and gas leasing in Situation I habitat will jeopardize the continued existence of grizzly bears or will result in the destruction of their habitat. While the Forest Service technically may have consulted with the Fish and Wildlife Service on the 1982 EA concerning Oil and Gas Leasing in Grizzly Bear Management Situation 1 and 2, that consultation was a sham since the Forest Service proposed no action. It was a forgone conclusion that Fish and Wildlife Service would find "no jeopardy" when no action was proposed.

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Forest Service Response

155-4 The decision to recommend lease denial in Situation I is supported by two environmental analysis documents. In both cases, there were no public comments on these documents which opposed this decision. These documents are the DEIS for Oil and Gas Exploration and Leasing within the Washakie Wilderness and the 1982 Environmental Assessment of Oil and Gas Operations in Grizzly Bear Situation I and II. Further, the decision was supported by the U.S. Fish and Wildlife Service in their formal opinions written for these documents. The U.S. Fish and Wildlife Service recently issued a "no jeopardy opinion" on the Forest Plan. This opinion was partially based on lease denial on Situation I lands.

The decision in the Plan does not constitute a withdrawal for it is a temporary ban on leasing. If Situation I lands were withdrawn, leasing following recovery of the bear would require negation of the withdrawal.

The Plan selected the option of requiring no-lease as opposed to withdrawal because in the event of a recovered grizzly bear population, leasing would again be considered. Further, the cumulative effects studies currently underway might help us understand ways in which oil and gas activities may be accomplished with no effect on the Grizzly. Once the cumulative effects can be predicted, then the Interagency Coordinator Committee could consider the general opening of Grizzly Situations I to leasing and formally consult with U.S. Fish and Wildlife Service.

There are many other resource restrictions in Grizzly Bear Situation I habitat. Timber operations as well as recreational opportunities are limited in these areas.

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Mr. Stephen P. Mealey
Forest Supervisor
Shoshone National Forest

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The method used by the Forest Service in this case is contrary to that intended by Congress in the Endangered Species Act. After all, if Congress had felt that oil and gas leasing and grizzly bear habitat were incompatible, would it not have gone further in the Act to designate areas of critical habitat and withdraw them from mineral leasing? Contrary to the Forest Service's interpretation in the Shoshone National Forest Plan, the intent of the Act is that most activities can continue on public lands, but with special attention paid to threatened and endangered species. The close look afforded by the consultation process allows the agency and the Fish and Wildlife Service to examine the likely impacts, mitigate them if possible, and if not, choose not to proceed with the action.

By avoiding the purpose of the consultation procedure under Section 7, the Forest Service has chosen to substitute its judgment for that of the Fish and Wildlife Service, and indirectly, that of Congress. Whether the judgment of the Forest Service is good judgment or bad judgment can be debated. But regardless of whether the judgment is good or bad, the action taken based on that judgment, i.e., the withdrawal of Situation 1 habitat, is in direct conflict with the Forest Service Chief's decision on the RMOGA appeal of the Routt National Forest Plan. Moreover, it is contrary to Section 204 of FLPMA, 43 U.S.C. 1714, as interpreted in Mountain States Legal Foundation v. Andrus, 499 F. Supp. 380 (D.C. Wyo. 1980). 4

In the Routt appeal, RMOGA contended that the Plan's use of certain criteria (in that case steep slopes, visual quality objectives, etc.) to effect a programmatic removal of lands from mineral leasing constituted a withdrawal within the meaning of FLPMA and therefore, was subject to the reporting requirements of Section 204. In his decision on the RMOGA appeal, the Chief avoided the question of whether or not such a programmatic removal of lands from mineral leasing would be a withdrawal under FLPMA because he concluded that the plan was inaccurate in its use of the phrase "no lease". According to the Chief, the plan really meant to say that certain conditions existed in certain areas where operational damages on surface resources would be irreversible and irretrievable, and that such conditions may lead to decisions not to lease but those decisions would be made later on a site-specific basis. The Chief then remanded the plan with instructions to use a more accurate term than "no lease".

On the Shoshone Plan, we would make the same allegation as we did on the Routt Plan. The Forest Service has pre-judged that certain conditions (in this case, grizzly bear habitat) are incompatible with oil and gas leasing and based on that judgment they have proceeded to withdraw some 66,000 acres. That clearly is a withdrawal under FLPMA and the Forest Service should proceed with the reporting requirements of Section 204. If a withdrawal is not intended, please clarify the final Plan.

Comment 155

FPD 155 0 L B
Proj. No. Ori Type Affil

September 30, 1985

Mr. Stephen P. Mealey
Forest Supervisor
Shoshone National Forest

page six

CONCLUSION

In addition to the major problems in the Plan discussed above, we would also like to bring your attention to items concerning Appendix K to the Plan. First, this Appendix, in conjunction with Appendix J and the maps, is very helpful in determining what stipulations apply to specific lands. However, most of the stipulations mentioned in Appendix K are actually located in Appendix E. These should be brought together in one appendix in the Final Plan.

Finally, Appendix K states that the Forest Service will endeavor to reply to the BLM on lease requests within 30 days. While we certainly support this as a reasonable time-frame, we suspect that this has not been the policy of the Shoshone National Forest in the past considering that 140 lease applications have been allowed to accumulate and some have been pending for nearly 10 years. We hope the Forest will abide by this 30 day time-frame to eliminate this reprehensible backlog and not allow it to occur again.

Thank you for this opportunity to participate in the planning process. We look forward to reviewing the final LRMP/EIS.

Sincerely,

Alice I. Frell
Public Lands Director

AIF:cw

Comment 156

Forest Service Response

MAILGRAM SERVICE CENTER
MIDDLETOWN, VA. 22645
03AM
RECEIVED OCT 3 1985

Western Union Mailgram

4-035181S276 10/03/85 ICS IPMRNCZ CSP CASA
7027867070 MGMB TDRN RENO NV 58 10-03 0420P EST FPD-156-W-M-E
Proj. No. Orig Type Affil

SHOSHONE NATIONAL FOREST
HEADQUARTERS
ATN STEPHEN P MEALEY, SPVR
PO BOX 2140
CODY WY 82414

(4-016683S276 1215 DUPLICATE OF TELEGRAM TELEPHONED, RELAYED BY MAILGRAM)

3077454636 TDRN LARAMIE WY 18 10-03 1215P EST

EFFORTS MAINTAINING INTEGRITY CLARKS FORK THROUGH SHOSHONE PLAN APPRECIATED. PRESERVATION WILDLIFE SCENERY RECREATION GREATER YELLOWSTONE ECOSYSTEM HIGHEST PRIORITY.
LEVA L STAFFORD
LARAMIE ALPINE AUDUBON CHAPTER
LONDON

1623 EST

MGMCOMP MGM

1

156-1 See response to comment 13-1 and 24-1.

Comment 157

RECEIVED OCT 4 1985

October 1, 1985

FPD-157-O-L-C
Proj. No. Orig. Type Affil.

Stephen P Mealey, Surpervisor
Shoshone National Forest
P O Box 2140
Cody, Wyoming 82414

Dear Steve:

I would just like to thank you for the intensive class you taught this summer for the Yellowstone Institute. You should remember some of my personal views regarding management of the grizzly bear in the Yellowstone ecosystem, but I would like to make the following comments to the Shoshone National Forest Plan.

I understand that the primary function chartered to the forest service is timber management, but somewhere along the line the grizzly has to have an economic value. The key is to determine an opportunity cost of not having the bear that would exceed the highest and best use currently provided by timber, oil and gas. Recreation is a big revenue producer also, and its participants can be more conservation minded than exploitive business concerns. Therefore, management of the Clarks Fork for wild and Scenic status appears to be more bear-compatible than other uses in the Forest. Yes it brings more people into bear country, but they are not concentrated in the prime feeding sites of the summer season. As an avid fly-fisherman, I would relish catch and release regulations. 1

I also oppose any further road building in your forest. It only serves to bisect occupied habitat, and provide more human access to the backcountry microsites that the bears utilize, as well as endangering travel corridors for the bear. I am also opposed to improvement of any existing roads, since most developers feel that if the road is already in place why should it not be used. The cumulative effects of access roads are the largest threat to the grizzly bear ecosystem, just as water rights are the largest single threat to wild trout populations. 2

Finally, as long as the grizzly is the highest priority for forest management situations, capable management like yourself will not let the bear population diminish below a minimum viable level.

I look foreward to seeing you again, probably next year during the grizzly mating season in June. I should be as video capable as Dr French by then!

Sincerely,

Stephen L Reed

Stephen L Reed
7905-5 East Colorado Avenue
Denver, CO 80231

Forest Service Response

157-1 The major purposes and responsibilities of the Forest Service are stated primarily in two Federal Laws, the Multiple Use Sustained Yield Act of 1960 and the National Forest Management Act of 1976. These laws clearly direct the Forest Service to provide, as appropriate, on National Forest System lands for all the multiple uses. Accordingly, the goal of Forest Service planning is to produce plans which provide for multiple use and sustained yield of products and services and, in particular, include coordination of outdoor recreation, range, timber, watershed, wildlife and fish and wilderness (16 U.S.C. 1600) in a way that maximizes long-term net public benefits in an environmentally sound manner (36 CFR 219.1). In short, the primary planning goal requires production of goods and services which assures coordination of resources and maximizes net public benefits.

Wilderness is but one of several multiple use values to be provided on the Shoshone. The suitability of the Forest for wilderness has been evaluated with the result that approximately 57% of the Forest's roughly 2.5 million acres have been designated as wilderness. The most recent wilderness additions occurred in 1984 as a result of the Wyoming Wilderness Act. This act also directed the release of nonselected areas for multiple use management. Forest Plan direction for these released areas as well as other multiple use management areas is to emphasize production of non-commodities while maintaining historic levels of production of commodities. This philosophy was chosen in recognition of the value of the Shoshone to the American public in terms of wildlife; high quality, low density recreation; and outstanding scenic values as well as its role in the Greater Yellowstone area. Production of commodities on the Forest as proposed in the Plan, is done under standards which are designed to enhance non-commodities as much as possible. For example, standards for timber harvests including cut block size, dispersion of cuts, density of roads and timber road management are designed to use commerical timber operations to improve cover to forage ratios for wildlife as well as improve the distribution and amount of structural and vegetative diversity in a way that allows for enhanced recreation access to the Forest when appropriate as well as visual diversity. Because all harvests in the Plan are above cost sales, they provide a mechanism for improving vegetative communities on the Forest, improving wildlife habitat and improving recreational opportunities in a very cost efficient manner. See also response to comment 44-46.

The Clarks Fork River has been recommended for Wild and Scenic River status. The Forest Plan is to maintain the Clarks Fork River in its current condition until Congressional consideration is given to the President's recommendation.

State of Wyoming Game and Fish Department big game herd population objectives will be met fully in all areas but one. The gizzly bear will be given primary management consideration in areas where it occurs on the Forest, approximately 52% of the total Forest acreage.

157-2 Adequate protection measures for the grizzly are in the Grizzly Bear Guidelines and in Standards and Guidelines. Site-specific projects will be analyzed in accordance with NEPA and the ESA.

It is recognized that disturbance activities such as timber sales can displace grizzly bears and potentially increase the risk of bear mortalities. Mitigation measures such as provisions for adjacent security areas and stringent controls on timing and administration of activities will be incorporated as necessary in timber sales. As indicated, logging can improve the quality and quantity of bear foods.

Comment 158

RECEIVED OCT 4 1985

FPD - 158 - P - L - C
Proj. No. Orig Type Affil

Sept 30, 1985

Dear Sir,

I am writing in regards to the proposed Shoshone Ntl Forest plan.

I support the Plan's recommendation to manage the Clark Fork River to maintain its eligibility for wild and scenic status. I support the plan to withdraw all wilderness + critical grizzly bear habitat from oil + gas development.

I encourage the Shoshone Ntl Forest to manage the Forest with the health of the Greater Yellowstone ecosystem + the preservation of wildlife, recreation + scenery as the highest priority. Conflicts between wildlife + other Forest uses should be resolved in favor of wildlife.

*Eliminate timber sales + roads from critical grizzly bear habitat.

*3) Eliminate roads into roadless areas.

*4) Eliminate roads + timber sales in the following areas: Deep Lake, Dinor Valley, Sawmill Creek, North of Sinks Canyon, lands surrounding Northern Meadows, Fiddlers Lake to Christina Lake, + areas

1

2

3

Forest Service Response

158-1 See response to comment 13-1, 51-3, and 68-8.

158-2 The preferred alternative has wildlife and recreation as the highest priorities. It is not designed to take away habitat. Nonwildlife and nonrecreational uses of the Forest are controlled with standards and guidelines for operations such that recreation and wildlife do not suffer. Refer also to response to comments 24-1, 33-4, 182-37, 44-46, and 44-43.

158-3 In the 1984 Wyoming Wilderness Act, Congress directed that nonselected roadless areas be released for multiple use purposes, and that "buffer areas" were not to be considered adjacent to Wilderness. With this legal direction in mind, some timber sales and the accompanying roads have been scheduled in roadless areas, while other currently roadless areas have not been scheduled. See also response to comments 182-5 and 44-46.

surrounding wilderness areas + Yellowstone National Park.

#5) Eliminate any development that conflicts w/ wildlife use of critical big game range for occupied grizzly bear habitat

#6) Add alternatives which do not assume benefits to wildlife + recreation from increased roads + timber harvest.

Thank you.

Sincerely,
Barbara Thessler
POB 524
Powell, Wy 82435

7 158-7 All projects proposed in occupied grizzly bear habitat will be evaluated to insure such actions do not jeopardize the continued existence of grizzly bear. Also see response to comment 14-5.

8 158-8 The planning process used did not assume that increased roading automatically benefited recreation. The relation of roads (existing and new) to recreation varies depending on the recreation opptunities being provided. Briefly, there are no roads allowed in Primitive areas, no open roads allowed in Semiprimitive Nonmotorized areas, only a certain density of roads allowed in Semiprimitive Motorized, and few restrictions on roads in Roaded Natural and Rural areas. Refer to EIS Chapter VII-Glossary under Recreation Opportunity Spectrum for for definitions. Prescriptions for individual areas were developed based on providing a targeted mix of recreation opportunities in that area. In or near that portion of an area targeted for primitive recreation, roads do not benefit, and in fact are a detriment, to recreation. In that portion of an area targeted for semiprimitive nonmotorized recreation roads will not benefit and may or may not be a detriment to recreation depending on location and road management. In areas targeted for motorized recreation, additional roads can benefit recreation. See response to comments 44-46 and 44-43. See response to comment 44-1

Comment 159

RECEIVED ... 4 1985

W.D. WEISS
P.O. BOX 2030
CODY, WYOMING

FPD-152-P-L-C
Proj. No Orig Type Activ

October 3, 1985

Shoshone National Forest
P. O. Box 2140
Cody, WY 82414

Gentlemen:

I wish to respond to your request for comments on the draft documents for the Shoshone National Forest Plan.

The areas which are of specific interest to me are Big Creek, Jim Mountain, Dunn Creek, Trout Creek and Logan Mountain. These areas are either near or adjacent to our property on the Northfork.

I am strongly opposed to the planned timber sale in the Logan Mountain, Dunn Creek and Trout Creek areas, as well as the road construction associated with this timber harvesting. In addition, I am against any road development currently under consideration or which may be considered in the future in any of these areas. 1

Sincerely yours,

W. D. Weiss

WDW/az

VI-446

Forest Service Response

159-1 In the Forest Plan there are no timber sales planned in the Trout Peak area in the first decade.

RECEIVED OCT 4 1985

FPD-160-P-L-B
Proj. No. Org. Type Appl

VALLEY RANCH

VALLEY RANCH ROAD
CODY, WYOMING 82414

October 1, 1985

Mr. Stephen P. Mealey
Forest Supervisor
Shoshone National Forest
P. O. Box 2140
Cody, WY 82414

Re: Shoshone National Forest plan

Dear Steve,

I spent a morning with the Shoshone National Forest Plan, Draft Environmental Impact Statement and Summary, and my head was "swimming" at the end of it all. It would take me a full month doing nothing else to make any sense out of it. Now I know what bureaucracy is all about, I think! So all I can do is give my recommendations for the Shoshone Forest that surrounds Valley Ranch (and Valley in general).

First of all, we would call for a specific EIS (Environmental Impact Statement) for the immediate surroundings of Valley, since Valley has been here for 93 years and the economic impact on Valley Ranch's business from such things as Oil & Gas leasing, Controlled Burning, etc. must be addressed. I note in the Scoping Statements that commercial outfitting is specifically mentioned, but not guest or dude ranching...one of the oldest industries in Wyoming...and Valley is one of the oldest of the oldest! You have promised open public meetings at the Valley School house next summer on the controlled burning issue, for which I thank you. As you know, I am opposed to any further burning in the upper Upper South Fork (Valley area) due to my feelings (scientific) that the ecosystem up here be left alone, not be subject to single-species management...even though we recognize this area as important Big Horn Sheep wintering habitat. The sheep have survived for thousands of years here without any "management" by man. The scenic values and multi-species approach to this ecosystem dictates against burning. Our specific economic interests do also. Our guests come from all over the World, and do not want to look at burned areas. We totally oppose oil and gas leasing, too. 1 2

In general, passive activities should be stressed in the recreation area...keeping this beautiful landscape in its natural condition, and not allowing man-manipulation, oil & gas or mineral development here. The roads should be kept unpaved, to slow traffic, keep a rustic "look" to the area, and allow for safe walking, jogging (running), horseback riding (which we have done for decades), hayrides, etc. More wildlife (including Big Horn Sheep) would be killed if the road was paved. The Forest Service should take a stand on this. Keep roadless areas roadless. Wildlife and Recreation are top values here, along with scenic. That's true in most of the Forest. 3

I strongly support the general stand of the Greater Yellowstone Coalition as applied to the entire Shoshone National Forest. Thank you for this chance to comment to you. Best regards.

Cordially,

Dr. Oakleigh Thorne, II. (Pres.)

cc. The Hon. Alan K. Simpson
and Greater Yellowstone Coalition

160-1 Following NEPA and Forest Service Manual procedures, when projects are contemplated in an area, an Environmental Analysis Process is initiated. The analysis process begins with scoping which evaluates the extent of interest in the proposal, the extent of possible impacts, the relation of the project to past, future, and adjacent management activity, and other such items. The decision to develop an EIS is based on the significance of possible or probable effects. In general it is not correct procedure to begin a project with the preconceived notion that an EIS is required. The analysis should lead to the conclusion as to whether or not an EIS is appropriate.

160-2 Fire, whether natural or planned, has been documented to be beneficial to many species of wildlife. Blackened areas are usually very short term in nature. Areas planned for such treatment are limited in this area.

160-3 See response to comments 42-1 and 44-46.

RECEIVED OCT 4 1985

WYOMING CHAPTER
SIERRA CLUB

FPD - 161 - W - L - E
Proj. No. Orig Type [illegible]

Sterling Evans
900 N. 10th
Worland, WY 82401

Oct. 2, 1985

Shoshone Nat'l Forest
Box 2140
Cody, WY 82414

Dear Sirs,

I would like to take this opportunity to comment on the proposed Shoshone Forest Plan. My name is Sterling Evans, I live in Worland, and am the treasurer for the Wyo. Chapter of the Sierra Club.

Overall, the proposed Shoshone Forest Plan is unacceptable because it denies the pristine preservation of the Greater Yellowstone Ecosystem. 1

More specifically, I would object to the releasing of 001,000 acres to timber harvesting that the Plan would allow. Likewise a million acres would be released to oil and gas exploration that I believe would be better managed as roadless areas. These roadless areas, which could amount to 665 miles, would adversely affect elk migration routes and other wildlife. (especially true in the North Fork area.) 2 3

One of my favorite areas in this forest is in the Beartooth Mountain ~~[illegible]~~ area which I would especially hate to see developed, in terms of road building, mineral exploration, or timber harvesting. I would request that less money be spent on timbering and road construction. I think the current 1440 miles of road already in the forest is sufficient. A non-motorized management system in the Beartooths would serve recreation there the best. 4

Thank-you for your attention to this concern. I will continue to support the FS's recommendation to try to gain "wild & scenic" status for the Clark River. I also appreciate your outspoken recommendation to preserve Grizzly Bear Situation I habitat. 5

Thanks again,

Sterling Evans

161-1 See response to comment 24-1.

161-2 Timber harvest levels in the final Forest Plan have remained approximately at the level of the proposed Forest Plan. The number of acres proposed for treatment has been reduced. This reduction in acreage reflects less emphasis on steeper, less productive areas (primarily stocked with lodgepole pine) and more emphasis on areas with higher productivity. Harvest levels have been established according to the economic viability of individual areas. Forest standards and guidelines are established which will insure that timber sales will not have adverse effects on wildlife, recreation, water, scenic beauty or other resources.

161-3 In the 1984 Wyoming Wilderness Act, Congress directed that nonselected roadless areas be released for multiple use purposes, and that "buffer areas" were not to be considered adjacent to Wilderness. With this legal direction in mind, some timber sales and the accompanying roads have been scheduled in roadless areas, while other currently roadless areas have not been scheduled. See also response to comments 182-5 and 44-46.

161-4 There is no road building planned or timber harvest scheduled in the Beartooths during the first decade of the Plan. The present management philosophy on the Beartooth is to manage as nonmotorized with only a few designated routes open. The Plan perpetuates this philosophy.

161-5 The Proposed Plan incorrectly states that we can apply for an extension of the protection period for the River. It is contingent upon an act of Congress to protect the River either by including it in the Wild and Scenic River System or by providing additional temporary protection. It is uncertain at this point whether the Clarks Fork of the Yellowstone River will become a part of the National Wild and Scenic Rivers system. The Forest Service and the Administration are in favor of the River's inclusion. Management activities that are within the discretion of the Forest Service will be designed to maintain the River's eligibility. Other activities that are presently within the discretion of agencies such as BLM (minerals) or Federal Energy Regulatory Commission (hydropower development) could affect eligibility characteristics of the Clarks Fork. In the event such developments are proposed, we would recommend denial to the appropriate agency, until Congress acts. See also response to comment 97-1a.

"Not blind opposition to progress but opposition to blind progress"

Comment 162

The Nature Conservancy

RECEIVED OCT 4 1985

FPD-162-0-L-E
Proj. No. Orig Type Appl

Tom Wolf
Protection Planner
719 Brookhaven Court, Suite D
Fort Collins, Colorado 80525
(303) 493-1407

September 30, 1985

Steve Mealey
Forest Supervisor
Shoshone National Forest
PO Box 2140
Cody, WY 82414

Dear Steve:

Thank you for the opportunity to comment on the Shoshone National Forest's Proposed Plan and Draft Environmental Impact Statement.

Our comments are drawn from the data base of the Wyoming Natural Heritage Inventory and from the Proceedings of the Wyoming Natural Area Needs Conference.

Begun in 1979, the Wyoming Natural Heritage Inventory is an organized collection of data on the status and distribution of Wyoming's natural diversity--rare plant and animal species, as well as exemplary natural communities. The collection is cross-referenced in manual, map, and computer files. These data have been compiled from a broad range of sources, including the collection records of museums and herbaria, publications, and expert biologists throughout Wyoming. This information provides an objective basis for determining the rarity of species within the state. Except where specifically noted, all data have been field checked.

Like the 40-odd other state Heritage Programs initiated by The Nature Conservancy, the Wyoming Heritage Program employs standardized methods to process information about a state's natural elements. All Heritage programs are connected through a larger, nationwide information system that provides a national as well as a global perspective to the concept of rarity.

Held in November of 1984, the Wyoming Natural Area Needs Conference brought together all the scientists and administrators responsible for defining the state's unique natural heritage. The consensus of the various working groups at the conference was published by The Nature Conservancy and made available to interested parties throughout the state, including your planning staff. Accompanying this document was a memo from the Rocky Mountain Regional Forester directing planners to incorporate the recommendations of the conferees into forest plans.

Comment 162

FPD-162-0-L-E
Proj. No. Orig Type Affil

The Nature Conservancy is a national private conservation group dedicated to the identification, preservation, and protection of biological natural diversity. The Conservancy's Public Lands Protection planners work cooperatively with federal and state land management agencies to assist in the identification, designation, and protection of significant natural areas under the authority of public agencies.

Information from both these sources indicates that there are significant occurrences of a number of the elements of Wyoming's natural diversity within the Shoshone National Forest. Our comments on the Proposed Plan and Draft EIS are directed toward the recognition and protection of the sites where these elements occur. The comments are also intended to help Shoshone National Forest planners and biologists begin assembling a Sensitive Plant list for taxa of special concern on the Forest. On other Forests, and at the Regional level, The Nature Conservancy will be working with agency personnel to establish such a list on a regional basis. Other Regional Offices of the Forest Service have found such lists to be valuable planning tools, since they provide planners with regionwide perspectives on rarity and diversity.

Our comments on the plan fall into three main categories: 1) Research Natural Areas; 2) Special Interest Areas; 3) The protection potential of a Sensitive Plants list, together with suggestions for taxa which should be included on that list.

Research Natural Areas:

The Proposed Plan: There are some mistakes on p. II-80-1. The total acreage allotted to RNA's is probably incorrect, given that the acreage for the combined Twin Lakes Alpine Ecosystem is listed as 722 acres, while in Appendix J-45 (Line Creek), the RNA acreage listed there is 726 acres. We suggest that there has been some mistake in computing the acreages of both parts of the Twin Lakes RNA, which seem to appear in different analysis areas. Please clarify. 1

Another problem is that II-80 should read: "A number of RNA's have been suggested by a task force of scientists and administrators. Acreages and suitability have not been precisely identified but will be considered in the next decade or two as dictated by priority." Removing the "not" presently included after "will" puts the Forest in compliance with the Regional Forester's directive. It is still not clear, however, what the Forest's policy is with regard to the suggestions of the task force mentioned above. If the Forest and the Region are to follow the priorities of the conference proceedings, which is what we would prefer, then that should be stated explicitly. If some other "priorities" are meant, then how will Forest planners arrive at them? How will budget matters be handled? Please note 2

Forest Service Response

162-1 The correct acreage is 726 acres. The documents have been edited to make this correction.

162-2 Two of five areas proposed for designation as Research Natural Areas (Twin Lakes and Sawtooth) in the preferred alternative were proposed in the Beartooth Plateau Unit Plan, completed on November 26, 1980. Work necessary for designation has been underway for some time. Other RNA's may be designated in the future after the five priority areas identified in the Plan are established.

The Sawtooth peat beds area is considered unique because of its location; it is the only known area of permafrost with a peat deposit this far south in the Rocky Mountains. "Unique ecosystem" has been changed to "unique landform" on page II-85 of the Forest Plan.

We continue to work toward improving the biological inventory of forest resources, and always welcome accurate information supplied by others to help us develop this.

FPD 162 0 L E

that the priorities of the task forces are clearly arranged in tabular form for each of the working groups--as requested by the Forest Service and the other co-sponsoring agencies.

Another problem is that the paragraph as it now stands in the Proposed Plan gives the impression that the proposed areas are all to be recommended or disqualified as RNA's. That is not necessarily the case, as in some cases RNA-designation may either prove inappropriate or impossible--see the Cathedral Cliffs example given below. Arrangements should be formalized whereby the Forest and the Conservancy cooperate in a systematic field check of the high priority sites on the Forest. Surely such plans would fall into the context of the Proposed Plan. They would also duplicate the highly satisfactory working relationship presently enjoyed by the Forest Service and The Nature Conservancy in Regions IV and IX. **3**

We support the first four RNA recommendations as recommended here. However, we feel that the recommended acreage for the Sawtooth Peat Beds (presently 160 acres) is too small to sufficiently protect this valuable site. We recommend that 320 acres would form a defensible preserve, including a buffer from the present jeep track. Our reasons for the larger recommendation: there are three main threats to this site: ORV misuse; improper sheep management; trespass cattle. **4**

ORV: A site visit in August of 1984 included the members of the Wyoming Native Plant Society, Dave Henry (Shoshone T&E biologist), and Len Hendzel (Region II ecologist). At that time, everyone seemed to agree that the whole basin should be included in the preserve design for the RNA. The extraordinary roughness of the Morrison Jeep Trail at this point would make a lower route through the RNA a tempting one. At p. III-246 under "Dispersed Recreation Management," the Proposed Plan says: "Discourage or prohibit any public use which contributes to the impairment of research or educational values. (0369)." And at p. III-247, under "Law Enforcement," it says, "Use special closures when necessary to protect the RNA from actual or potential damage from public use. (0381)>" If the Morrison jeep road is as popular as the Proposed Plan states elswhere, then it should be managed better that at present. The Forest should take the lead in getting ORV users to improve the road, especially in the crucial section near the RNA. A firm track should be established for the road, and this track should also form, at a bare minimum, the upper boundary for the RNA. Other Forests have been able to encourage such cooperation with ORV organizations through the Forest Volunteers Program. Examples were given at the Forest Service-sponsored Roading Symposium held in Casper in December of 1984. The Nature Conservancy would be glad to cooperate with both the Forest Service and local ORV organizations in such work, including educating members in the values of the RNA. We have no **5**

162-3 See responses to comments 162-2 and 162-4.

162-4 Lenard Hendzel, Regional Ecologist reports that past disturbances, inclusion within active cattle allotments, and uses being made of the area by the neighboring dude ranch, preclude establishment as an undisturbed RNA. However, Hendzel does recommend designating the site as a Special Interest Area (SIA). He will work with the District, Forest and the Wyoming Nature Conservancy in preparing an SIA establishment report.

162-5 Proper maintenance of all roads and trails is included in the budget identified in the Forest Plan. The Forest has been successful in the past in acquiring volunteers and contributed funds in support of recreation facilities including trails. This effort will continue in the future. The type of recreation opportunity bieng provided along the jeep trail is classified as semi-primitive motorized, users of such areas expect trails to provide a challenge and to be rough in spots. Upgrading this road to a standard that would facilitate use by 2 wheel vehicles will change the recreation opprotunity provided as well as encourage more use of the area. It will be maintained to keep use on the current trail and to protect soil, water, and wildlife resources.

Comment 162

FPD- 162 0 - L - E
Proj. No. Type Appl

in restricting the enjoyment of this jeep trail, but we do feel that the Proposed Plan inadequately details management plans for possible conflicts between this RNA and ORV use. The right place for such stipulations would be J-47.

Sheep: The same shortcomings are found with regard to grazing practices. Obviously, each RNA presently lacks and desperately needs a management plan tailored for its unique needs. The Nature Conservancy has ample experience in writing such plans for our own system of preserves, and we would be glad to cooperate, but final responsibility for the design and implementation of such plans must rest with the Forest Service and should be detailed in the Final Plan. At III-246, the Proposed Plan says: "Restrict grazing by livestock to that essential for the maintenance of a specific vegetation type. (0372)." It is not clear from the Proposed Plan what the status is at present of the Stockade Sheep and Goat Allotment. If the allotment is in use, then the Forest Service must monitor this situation closely to be sure that the herder knows that he must keep sheep out of the RNA. Any trampling or feeding by domestic livestock would contribute to a deterioration of the quality of this site--specifically, disturbance of the site would accelerate tha melting of the permafrost and thus interfere with the maintenance of the specific vegetation type for which the RNA has been established. 6

Cattle: It is not clear from the Proposed Plan whether this allotment is eligible for conversion from sheep to cattle. If it is, then this conversion should take place under stringent guidelines designed to protect all of the Thief Creek riparian area. Degradation of this area would contribute to degradation of the RNA, both directly through cattle trampling and feeding in the RNA and indirectly through alteration of the Thief Creek hydrograph. During site visits in 1982 and 1983, Conservancy scientists observed trespass cattle near the lower end of the proposed RNA. That is why we strongly recommend that an improved preserve design include a drift fence at the lower edge of the RNA. 7

We also intend the above remarks to apply to the similar values present in parts of the Twin Lakes RNA, which is in equal need of a well-designed management plan.

Finally, it is not biologically accurate to characterize this site as a "peatbed." The proper term, which accurately describes the site's uniqueness, is "fen-palsa." Earlier, we provided both Steve Mealey and Dave Henry with the scientific literature relevant to this site. The Proposed Plan appears to be following old data provided before Conservancy scientists did a thorough evaluation of the site. The correct literature citations and scientific characterizations are also listed in the Proceedings 8

Forest Service Response

162-6 The Peat Beds RNA is not in the Stockade Allotment. It is in Peat Beds (018) Allotment Management direction will be to protect from domestic livestock grazing from this point in time on. Some facilities will be necessary to implement this protection such as a drift fence.

162-7 The Sawtooth peat beds area is considered unique because of its location; it is the only known area of permafrost with a peat deposit this far south in the Rocky Mountains. "Unique ecosystem" has been changed to "unique landlform" on page II-81 of the Proposed Plan.

The reference in the DEIS (page IV-80) to signing boundaries and law enforcement is derived from Forest Service Manual, section 4063.3. This directs that special closures of RNA's may be necessary to protect such areas from actual or potential harm resulting from public use. Of course, the area must be properly identified before closures can be enforced.

We continue to work toward perfecting the biological inventory of forest resources, and always welcome accurate information supplied by others to help us develop this.

162-8 See response to commentS 87-1 and 14-9.

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of the Wyoming Natural Area Needs Conference (referenced above).

In summary, there do not appear to be adequate management plans for the proposed RNA's, unless these are included in the Establishment Records from the Regional office which we have not yet seen. We have attempted to work in close coordination with the Region II RNA Committee, so it seems more likely that these shortcomings are a more general problem related to monitoring and evaluation--namely, the requirements listed in the Proposed Plan under this heading are not site specific enough to protect the values for which RNA's are established. It does not appear to us that the Vegetation Data Base cited on p. IV-5 (Table IV-1) is capable of the level of resolution needed to address this aspect of the Forest Service's obligation to manage to maintain present levels of natural diversity on the Forest. The appropriate place for management prescriptions of this sort would be Appendix J.

9 162-9 Management direction (site-specific) for RNA's will be in separate management plans on districts. Appendix J does not include the site-specific direction.

The DEIS: At IV-80, this is a correct characterization of the Natural Area Needs Conference, except that "a task force of Science..." does not make sense and should read "scientists."

10 162-10 Text has been corrected.

Special Interest Areas:

The Proposed Plan: At III-104, the Management Prescription Summary should include "10C" for Special Interest Areas. Without this prescription, which is included in all the other Wyoming plans in Region II, the Forest will lack the flexibility needed to protect site-specific examples of natural diversity.

11 162-11 As discussed in Chapter IV of the Plan, whenever there is new information which might change management of an area, the situation will be studied and if there is a need to amend that direction, it will be amended. This provides a great deal of flexibility to deal with improved inventories of resource values exisiting on the Forest. This means that if areas of specific examples of diversity are identified, this information will be evaluated and used to make any needed changes to management direction called for to protect such areas.

The best example of the shortcomings caused by failure to use 10C is the Proposed Plan's complete omission of the Cathedral Cliffs Wetlands Complex, nominated by the Natural Area Needs Conferees as the top priority botanical site on the Forest. In the fall of 1984, The Nature Conservancy submitted a botanical evaluation and set of management recommendations to the Forest and to the Region II RNA Committee. We contracted with Mr. Erwin Evert for this work.

Cathedral Cliffs is in Analysis Area #004, where the Proposed Plan sets forth some management that might compromise the values of the wetlands unless carefully designed for multiple use purposes. Earlier this year, we commented on the proposal to change the roading system in the Crandall 1 and 2 allotments, and we repeat here that we would like to see these plans included as part of the Final Plan for the Forest. Here are the reasons:

1) Timber harvest--for the upcoming decade, the Proposed Plan programs 7 sales in the area affecting these wetlands, totaling 4971 MBF. That is a lot of timber to be cutting during a short time, and we suggest that there is a place in the Final Plan for a Cumulative Effects Analysis and Trend Chart of the

12 162-12 See response to comment 87-1. A cumulative effects analysis effort has begun for the grizzly bear. Results of this analysis will be used as a basis for amending the Plan if indicated. Before any actions indicated in the Plan are implemented, additional site-specific analysis will be carried out as appropriate to the impact of thoses actions. This analysis will incorporate new techniques and software as they become available.

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Forest Service Response

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sort currently available from Hal Salwasser, Ecologist for the National Forest System in Fort Collins, Colorado. Mr. Salwasser can also provide to you, as he already has done to us, copies of the software he and Richard Holthausen have developed for the purposes of Risk Assessment in situations like that in Analysis Area #004. At the very least, these methodologies should be employed in laying out the management options for grizzlies in this Analysis Area. At the very best, they could also be used to assess risks and cumulative effects for Cathedral Cliffs Wetlands Complex. 12

2) Roads--The Proposed Plan seems to indicate that no roads will be constructed to access the timber immediately adjacent to the wetlands. If the Forest Service intends to follow out its plans as indicated in the Environmental Assessment issued earlier this year, then this must mean that the present road to the K Bar Z Ranch will be "re-opened," even though plans were to have called for closing this road. Please clarify. Our concerns are that sedimentation from increased timber harvest and from the extremely poor condition of the old road, combined with the effects of building the new road, could adversely affect the wetland values of this site. No section numbers are given for the two sales totaling 549 MBF and 286 MBF, so it is not clear exactly what areas are targetted or what silvicultural regimes will be appropriate. The Proposed Plan says that these stands are Picea engelmannii, but this is not accurate, since stand composition grades into Picea glauca as one approaches Swamp Lake. Erwin Evert's report, mentioned above, contains these sorts of detail, and it would be a comfort to see both the report and the area given the attention they deserve in the FEIS, where specific plans should be mentioned concerning the need to leave filter or buffer strips to protect the wetlands. This would also be a good place to explain the present practice of felling some of the white spruce intruding on the edges of the swamp. Special Interest Areas need biologically sound management plans just as much as RNA's, and so such practices would have to be justified, as would the continution of horse grazing along the edges of the wetland. Another place for these considerations would be at J-20-23, under "Special Areas." And Cathedral Cliffs should be mentioned at G-1, since a part of the management plan should be watershed monitoring. 13

When we submitted Cathedral Cliffs to the Region II RNA Committee, we were told that it did not qualify as an RNA because of a history of incompatible uses within the last 50 years. While observing the letter of the law, this decision has its absurd side, since this area represents a refugium for species that were more continuously distributed in the U.S. during the last glacial period. Obviously, prior uses have not disturbed or degraded this unique site, but we are willing to accept the RNA disqualification in return for an agreement on the part of the Region II RNA committee to recommend this site for Special Interest Area designation. If that recommendation has not been 14

162-13 See response to comments 162-11 and 162-12.

162-14 Lenard Hendzel, Regional Ecologist reports that past disturbances, inclusion within active cattle allotments, and uses being made of the area by the neighboring dude ranch, preclude establishment as an undisturbed RNA. However, Hendzel does recommend designating the site as a Special Interest Area (SIA). He will work with the District, Forest and the Wyoming Nature Conservancy in preparing an SIA establishment report.

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received by the Forest yet, then there is a Region-Forest communication problem, which we urge you to correct as soon as possible. As part of this same agreement, the Region II RNA Committee agreed to re-consider its mission and responsibility for planning for diversity on the forests of the Region. This was supposed to translate into recommendations for both RNA and SIA status regionwide. At an August, 1985 meeting with Regional Forester Jim Torrence, this agreement was re-affirmed, pending the arrival of the new chair of the Region II RNA committee. As of Oct. 1, 1985, the new chair and the Conservancy should be providing better information about both sorts of designation to forest planners. We hope to see more of this information in the Final Plan, beginning with Special Interest Area designation for Cathedral Cliffs Wetlands Complex. 14

Sensitive Plant List:

The Proposed Plan: According to the 1982 Forest Planning Regulations implementing the National Forest Management Act, planners should provide a list of species where viability is a concern. Further, this Sensitive Plant List should include specific directions about the amount and distribution of habitat and their relation to the number of individuals in a populations. This List is missing in the Proposed Plan. It should be included in the FEIS and Final Plan. 15

In the spring of 1984, we gave candidates for such a list to Steve Mealey, and then we followed this up in a June 1, 1984 letter to Dave Henry. Unfortunately, there is no mention of this list in the Proposed Plan or DEIS. This is a serious shortcoming, since many of these taxa require positive management on behalf of the Forest Service to save them from destruction. We enclose a copy of the letter to Dave Henry, which should have served as the nucleus of a Sensitive Plants List. The supporting documentation has already been supplied to both Dave Henry and Steve Mealey, so we do not include it here again.

As we try to make clear in our June 1, 1984 letter to Dave Henry, all we are asking for at present is a flag in the planning process, so that if and when threats to these taxa arise, they can be dealt with on a case-by-case basis. If further inventory uncovers sites where defensible preserve designs seem possible, then it would be appropriate to consider these sites for either SIA or RNA designation. In the meantime, it is extremely disturbing and disappointing to find no mention whatsoever of these concerns in the Proposed Plan and DEIS. We believe that the Forest Service's mandate to manage to maintain biological diversity extends beyond the grizzly bear. It extends to <u>all the elements of natural diversity as they are found on the Forest.</u> When provided with a year's lead time and good biological information, it defies reason for the Shoshone's planners to ignore these concerns. We also believe that the Proposed Plan should include an effort to complete an inventory 16

162-15 There are no federally classified threatened or endangered plant species on the Shoshone National Forst. Should any plant species be so classified in the future, appropriate protection measures will be implemented as required by the Endangered Species Act. The Forest has no proposed plants for the Sensitive Species List.

162-16 There are requirements for diversity and maintenance throughout Chapter III of the Plan. It is also one reason for implementation of such practices as treatment of sage, aspen and willow as well as some of the timber harvests and the liberalized fire prescriptions included in the Plan. As is required through Forest Service Policy, there are many on-going data collection efforts designed to identify the condition of forest resources and inventory items of special concern. These will continue in the future. Whenever some truly unique area is identified, a lengthy process of verification is begun. Given that this often involves many people within and outside the Forest Service, it often takes 3 to 5 years to verify, complete environmental analysis on such an area, and recommend for or against designation as an RNA or an SIA. Such efforts will continue as rapidly as the availability of resources permits.

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of the sites mentioned.

Conclusion: Until the above-mentioned concerns are addressed, we cannot formally endorse any of the proposed alternatives. All we can say is that the Preferred Alternative does not seem inimical to our concerns.

In general, we feel that the Proposed Plan and DEIS are weak in the areas of monitoring and implementation. We would like to see a list of the costs of these actions, together with a contingency plan should funding prove unavailable. This is particularly important for the designated Research Natural Areas. It should also be addressed when Cathedral Cliffs Wetlands Complex is added to the Final Plan as a Special Interest Area. And it should be part of the effort to inventory the sites that must be covered when a Sensitive Plants List is added to the FEIS and Final Plan. 17

Thank you for the opportunity to comment. There is much to admire in the Shoshone Proposed Plan and DEIS. There is also room for a great deal of improvement. We stand ready to cooperative with forest planners in improving the quality of the final product.

Yours,

Tom Wolf

cc: Region II RNA Committee
Russ Burns, WO

Forest Service Response

162-17 We agree that monitoring of Plan implementation is critical and that this feedback loop needs to be provided so that management of the Forest can be adjusted as needed. Such direction is in the regulations governing land and resource management planning (36CFR219). There has recently been much effort given by the Forest Service in general to the subject of monitoring and implementation of Forest Plan. These efforts have resulted in Supplements to the Forest Service Manual. Discussion of the planning regulations and in the Supplements has been added to Plan, Chapter IV. As stated in Plan, Chapter IV, details of monitoring are included in the documents incorporated by reference. All such documents are available for review by the public. It is just not possible to incorporate all details of monitoring into Plan, Chapter IV.

When things do not go according to plan, an evaluation will be made as to the seriousness of the deviation. When new information is obtained, the significance of that information as it relates to management of the Forest is evaluated. In cases such as these, response will be taken as appropriate ranging from no response, to issueing a Plan amendment, to completely redoing the Plan.

The Plan is to be in essence a "contract with the public" stating that this is how we are going to manage the Forest for the next 10-15 years barring arrival of significant new information. One purpose of planning is to reduce the ability of individual civil servants to change the intent of the Plan towards their personal philosophy. It is up to the Forest Service internally and the public to see that the Plan is followed or changed to meet needs by appropriate processes.

Most of the money spent in monitoring is included in the "program management" for each resource. This includes keeping resource records, evaluation of standards and guidelines to determine adequacy, and carrying out the monitoring as spelled out in Plan, Chapter IV. The money listed for monitoring in Appendix J is slated for monitoring specific projects rather than for a resource program in general.

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Forest Service Response

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Proj. No.

Louisiana-Pacific Corporation

P.O Box 787
Dubois, Wyoming 82513
307/455-2239

October 2, 1985

Mr. Stephen P. Mealey, Forest Supervisor
Shoshone National Forest
P.O. Box 2140
Cody, WY. 82414

Dear Mr. Mealey,

We wish to take this opportunity to provide you with our comments on the draft EIS and Shoshone National Forest Plan. Alternative B best serves our needs; however it has been difficult for us to judge the effects of this plan on our Dubois-Riverton operations because of insufficient timber related information. Certainly Alternative C would be unacceptable to us. Alternative D is apparently offered as a compromise, but this compromise fails to depolarize the major local forest users. The EIS describes how noncommodity resources are to be emphasized while deemphasizing commodity resources but fails to adequately demonstrate the effects of this change in management on the people who now are more or less dependent upon the commodity resources. People in the community of Dubois are just now beginning to see the implications of reducing timber harvest on both the Bridger-Teton and Shoshone National Forests. We challange that the people of Wyoming do not see the implications of reduced leasing for oil and gas on these public lands.

Region 4 of the forest service is now conducting a study of the socio-economic situation here in Fremont County as it relates to the harvest of timber. This study is expected to show how a significant reduction in timber harvest levels might affect Dubois and Riverton but will also demonstrate some impacts upon the community of Afton and how the potential loss of the C&NW railroad might affect Fremont County. This forest service study and the results of a Wyoming state study of the C&NW railroad should be included in the final plan inorder for the public to understand the impacts of suggested management changes. 2

163-2 Economic impact analysis of a Forest Plan and its alternatives should be done to see how management of that Forest will effect local economic and social systems. This was done for the Shoshone Plan. In this analysis, it was found that we have an effect on local economies through our management of timber. For this reason, the preferred alternative attempts to maintain harvest levels at historic levels. In that part of the Forest effecting the Dubois-Riverton timber industries, the allowable sale quantity of timber is at or slightly above the average amount of timber sold in that market from the Shoshone in over the last 15 years (average annual in the plan is slightly above 5 MMBF for the Wind River District in the Plan while over the period from 1971 to 1985 average annual from the same District has been about 4.5 MMBF).

From this analysis and from the fact that mills in this area require 24 MMBF to 26 MMBF per year to remain viable, it appeared that timber from the Shoshone was not a determining factor in supporting this industry. The same is true of the Forest's influence on the rail lines. In fact, given that the Plan proposes about the same level as offered over the last 15 years, the change caused by the Plan was deemed insignificant.

The Shoshone has met with planners from the Bridger-Teton and economists from Region 4 on this issue including a meeting in Dubois. Until the Bridger-Teton publishes a draft with a preferred alternative which indicates their intentions regarding timber to be offered to this market, there is little else that can be done to look at joint effects. Again, the major effects will be the ability of the Bridger-Teton to supply the 19 to 21 MMBF that can not be supplied by the Shoshone. At the time their analysis is complete, there will be an analysis of joint effects.

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Timber inventory and timber needs data is lacking in the EIS. No where can we find the total timber growth potential or the mortality that occurres from fire, parasites, disease, windthrow and other losses. Neither are the timber needs data shown. We are especially concerned that while all other resource uses were represented on the "core" planning team a representative of timber uses was excluded. Statements that there is insufficient timber demand to support departure demonstrates that there has been a lack of consideration given timber industry needs in the Wind River drainage. Our Dubois mill requires 21 million board feet annually to operate efficiently and has been unable to purchase this volume for over a decade. No where in the EIS can we find the biological timber harvest potential given biological constraints. If the biological timber harvest potential is 26.2 million board feet then the EIS should have described how the forest service arrived at a preferred level of 11.8mmbf. With a difference of 14.4mmbf, even one third of this wasted timber volume would have improved our future here at Dubois. One of the stated goals of the EIS & Plan was to supply timber sufficient to attract investments but the preferred alternative does just exactly the opposite by limiting opportunity, maintaining present timber harvest levels, placing emphasis on noncommodity uses resulting in industries failure to be able to see a future. **3**

We cannot accept the EIS & Plan rational that timber rotation ages of 140 to 160 years for LPP are based upon the culmination of mean annual increment. Timber harvest is planned using a shelterwood or selective cut system that results in increased competition, increased potential for parasitic infection both of which reduce the forests potential growth rate. Culmination of mean annual increment would occur earlier under these conditions than would a LPP forest that was managed to reduce competition, limit parasitic infection and otherwise maintain the health of the trees. On the BTNF where a clearcut harvest approach is used they have determined the culmination of mean annual increment to be 90 years for LPP. This difference of over 50 to 60 years suggests that there are other reasons for the extended rotations on the SNF. If this difference is the result of reproductive rates the cause should be properly pointed out to the public who have already shown concern for the slowness of regeneration on harvested forest lands. All these reasons should be explained in the EIS. **4**

The Wind River drainage is essentially roaded giving the forest land managers a real opportunity to salvage the timber losses resulting from the major ongoing epidemic of mistletoe and commandra rust. These LPP stands are high risk, fail to provide wildlife habitat, provide a major threat given a

Forest Service Response

163-3 All disciplines were represented in formulation of the DEIS and Proposed Plan. See EIS Chapter V. See also response to comment 18-3.

163-4 Culmination of mean annual increment for lodgepole pine is about 110 years on the Shoshone. This varies by site class. This was reported in Appendix B in the EIS. The long rotations mentioned in the comment were the results of Steady State Analysis as discussed in Appendix B and C. Assumptions in steady state are that the Forest is already regulated (managed) and the questions asked are what are the rotations which would maximize volume or maximize present net value once the Forest is regulated. For lodgepole, the answer varied between 140 and 160 years with one or more thinnings as the most economically efficient given the assumption. But this was only one of the analyses done.

Other analyses included what would be the most economically efficient rotation during the period from now to full regulation. The answer to this, particularly for managed, regenerated lodgepole was a rotation of 100 to 120 years with the predominant rotation being 100 to 110 years. This answer is almost identical to culmination of mean annual increment. Shelterwood systems for lodgepole are selected for many stands on the Forest because that is the only way natural reproduction of these stands will occur. This is based on over 10 years of experience with such stands and conditions on this Forest. Natural regeneration is preferred over the planting done on the Bridger-Teton for it keeps cost of site preparation to a minimum and eliminates rather substantial planting costs. In this way, timber can be produced in a cost efficient manner.

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forest fire, and/or will offer a slow and parasitized recovery with out fire or timber harvest. The EIS & Plan fail to provide silvicultural stand projections that graphically display the predicted conditions of the LPP and other timber stands during future decades. The probable losses are major and we challenge that they cannot truly be justified in terms of long term needs of the American public. A departure should be considered and it should be accomplished by working with the BTNF and their timber program to insure evenflow and sustained yield within the working circle of the Dubois timber industry. Contrary to the discussion that appears under Non-declining Flow Appendex B of the EIS there is sufficient industry demand for timber to support further study of a departure alternative. 4 5

Because of the location of the existing timber industry the SNF should have already begun to work with the BTNF to project harvest levels and industry needs. The final plan should include discussion of how the two forests can work together to insure preservation of existing industry, of the 190 direct jobs associated with the Dubois timber industry and of the economic stability of the Dubois community. We understand the National Environmental Policy Act and the Forest Management Act to require the evaluation of impacts outside of the forest boundaries which result from forest management decisions. 6

We have difficulty understanding why productive forest land in Salt Creek, Bear Creek and East Fork have been identified as not suitable or have not been scheduled for timber harvest. Some of these lands have already had timber harvest. The 1984 Wyoming Wilderness bill released roadless areas to multiple use until the next planning period. Any withdrawal now should have been explained in the EIS. 7

Forest service discussion relative to the EIS & Plan suggest that more use of fire as a management tool would result from the preferred alternative. While we agree with the use of fire as a tool to maintain and or increase wildlife habitat in those areas where fire would be easily controlled and the effects on soils would be minimal we have real problems with any suggestion that timber lands would be allowed to burn. Natural and unscheduled fires can and do result in catastrophic forest resource losses. The EIS fails to show how forest land burning would be scheduled to prevent these catastrophic losses. The forest service cannot ignore a discussion of the implications of this type of forest land management within the EIS & Plan. 8

The reduced budget Alternative E is very unrealistic. Commodity uses will normally return money to the treasury 9

163-5 We recognize that there may be a problem and the Forest Supervisor has agreed to study the situation further. It will not however, be possible to accomplish this within the time frame of the Forest Plan.

163-6 See response to comment 163-2.

163-7 Timber in Salt Creek and Bear Creek is available for harvest, however no harvest is scheduled in the first decade. No tentatively suitable timber land was identified in Eask Fork.

163-8 Under burning conditions that would lead to catestrophic losses, the wildfire suppression strategy prescribed in the plan is for a one hour attach and subsequent control on all tenatively suitable timber land and a buffer zone of 1/2 mile around those lands.

163-9 The commentor is correct in terms of the budgeting trends of Congress over the last 6 to 8 years. The purpose of the reduced budget alternative was to identify what the Forest would produce if total dollars were reduced 25% from their fiscal year 1982 levels. Given that, a decision as to how to formulate this alternative had to be made. One method would be to guess at what the priorities of Congress would be when disaggregated from the broad national trends to the Forest. A second would be to formulate such an alternative in a way that it maximized economic efficiency benefit to the American public through management of the Forest under a budget restriction. Given the impreciseness of guesses at Congressional intent over the next 10 years, it was decided that more useful information could be provided by the latter approach. That is what is represented in Alternative E. Part of the analysis of the implementability of this alternative is precisely the point raised by the commentor. This, though, is the same assumption of all alternatives. Further, one of the purposes of Forest Planning is to provide information to Congress on the possible results of their actions. Again the approach taken provides a more accurate picture of what their "best buy" would be if they reduced the Forest's budget. For these reasons, alternative E was formulated as depicted in the EIS.

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while noncommodity uses have not done so todate. It has been the practice of the U.S.Congress to limit appropriations for noncommodity uses at times of poor national economics. The forest service needs to explain for the public why they believe the very opposite is more likely to occur on the Shoshone National Forest. 9

We have never heard of a Grizzly Bear being eaten by a drilling rig. There is certainly sufficient motivation of the people employed by drilling companies, as there is for outfitter operations, for these people to give the right of way to the grizzly bear. Our observation would be that drilling companies have even more motivation to preserve the grizzly bears and less direct conflict than outfitters. Grizzly bear habitat should not be a limitation on drilling for oil and gas. Recent oil and gas developments on forest service lands are good examples of how the land can be returned to its natural condition given sufficient need to do so. 10

Sincerely,

R L Baker

Louisiana-Pacific Corp.
R. L. Baker
Cheif Forester

Forest Service Response

163-10 The decision to recommend lease denial in Situation I is supported by two environmental analysis documents. In both cases, there were no public comments on these documents which opposed this decision. These documents are the DEIS for Oil and Gas Exploration and Leasing within the Washakie Wilderness and the 1982 Environmental Assessment of Oil and Gas Operations in Grizzly Bear Situation I and II. Further, the decision was supported by the U.S. Fish and Wildlife Service in their formal opinions written for these documents. The U.S. Fish and Wildlife Service recently issued a "no jeopardy opinion" on the Forest Plan. This opinion was partially based on lease denial on Situation I lands.

The decision in the Plan does not constitute a withdrawal for it is a temporary ban on leasing. If Situation I lands were withdrawn, leasing following recovery of the bear would require negation of the withdrawal.

The Plan selected the option of requiring no-lease as opposed to withdrawal because in the event of a recovered grizzly bear population, leasing would again be considered. Further, the cumulative effects studies currently underway might help us understand ways in which oil and gas activities may be accomplished with no effect on the Grizzly. Once the cumulative effects can be predicted, then the Interagency Coordinator Committee could consider the general opening of Grizzly Situations I to leasing and formally consult with U.S. Fish and Wildlife Service.

There are many other resource restrictions in Grizzly Bear Situation I habitat. Timber operations as well as recreational opportunities are limited in these areas.

Comment 164

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OUTDOORS UNLIMITED, INC.

"Working Today to Develop The Multiple Use of Public Lands"

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October 2, 1985

Mr. Stephen P. Mealey
Forest Supervisor
Shoshone National Forest
P. O. Box 2140
Cody, WY 82414

Dear Mr. Mealey:

Outdoors Unlimited, Inc. is an organization whose members support multiple use and sustained yield management of public lands. Many of those members have reviewed the Shoshone National Forest Draft Land and Resource Management Plan. Please add this letter to the record of comments on the Plan.

Our members report that issuance of the draft LRMP strongly indicates that the Shoshone plans to be dedicated to principles of non-management, especially in those areas formerly listed among the multiple uses: timber, grazing, motorized recreation, minerals and energy.

Of overriding concern is the bias shown in the plan against development of energy resources. Outdoors Unlimited specifically supports the statement of the Rocky Mountain Oil and Gas Association pertaining to land withdrawal from energy exploration and development. Areas of public land with energy interest, evidenced by lease applications and indications of geological favorability, should not be withdrawn for the simple reason that this country's energy security rests of development of domestic reserves. We strongly urge that the final LRMP contain changes which objectively and realistically plan for the potential for energy production from the forest as a positive and legitimate use. 2

Our members further support an active and aggressive timber management program on the non-Wilderness forested acres to assure that at least some wildlife and domestic livestock habitat will be improved. We can assure you that improved habitat will be a requirement because of natural deterioration of Wilderness habitat through non-management. Timber management will assure that a small portion of the Shoshone National Forest will be green and growing; this too will be vitally necessary in the future. 3

Forest Service Response

164-2 The General Mining Laws guide what can or cannot be withdrawn from mineral entry and under what conditions. We direct your attention specifically to Plan, Chapter III in the blue pages under Mining Law Compliance and Administration (General Direction 1C and 2) and Minerals Management Oil and Gas and Geothermal (General Direction 1). All direction found under Minerals Management, supplemented by Plan Appendix K, is intended to protect existing and proposed uses of the land for other resources thereby avoiding the need for withdrawal. If exceptional situations arise, or existing direction is shown to be insufficient, the option of withdrawal remains.

Mineral operations are by law, a viable use of public land. Our charter, provided by Congressional action, is to manage first according to law, and not strictly according to variable market pressures. The mining laws stipulate that lease applications can be made and must be considered for lands not withdrawn. The Forest Plan was selected in large part because it allows mineral activities while recognizing and maintaining the values of clean water, stable wildlife populations, and recreation opportunities which are of primary importance to many Forest users. The Forest Plan affords adequate protection of popular recreation areas, critical wildlife habitat, and other such resource values through application of stipulations and recommended operating procedures. Protection may be in the form of seasonal restrictions or no-surface-occupancy stipulations (see Appendix K of the Plan).

One consideration here is that a lease may never result in actual drilling activity; historically, a low percentage of leases are explored or developed, due in part to market fluctuations and uncertainties.

164-3 Timber Harvest levels in the Forest Plan have been established according to economic viability, and timber type and condition. Harvest levels in the Plan remain approximately the same as in the proposed Plan, and are slightly higher than levels of the last ten years.

Comment 164

Forest Service Response

FPD-164-0-L-E

Mr. Stephen P. Mealey -2- October 2, 1985

Unrestricted non-motorized recreation use dominates the draft LRMP for the simple reason that two-thirds of the Shoshone is, for all practical purposes, withdrawn from all but custodial management. Our members believe this was not the intent of Congress when it passed the Multiple Use - Sustained Yield Act (1960). The Forest and Rangeland Renewable Resources Planning Act (1974), amended by the National Forest Management Act (1976), or the National Environmental Policy Act (1969). We believe the evidence is clear that Shoshone National Forest personnel have abdicated their management responsibilities in favor of preservation and plan writing. They see undue influence reflected in the draft LRMP from local, special-interest groups to the detriment of the national public interest. We urge changes to the Plan which reflect the necessity for and positive impacts of all the legitimate, authorized uses of this important National Forest.

4

164-4 See response to comment 42-1 and 44-46.

Thank you for considering our views.

Very truly yours,

Marlene Simons by rla

Marlene Simons
President

Comment 165

Forest Service Response

RECEIVED OCT 4 1985

FPD-MS-F-L-C
Proj. No. Orig Type Affil

September 30, 1985

Supervisor Stephen P. Mealey
Shoshone National Forest
P.O. Box 2140
Cody, WY 82414

Dear Mr. Mealey,

A resident of Dubois, I wish to express my feelings regarding management of the Shoshone National Forest and the plan now under consideration.

First, I applaud any USFS efforts to manage the Clark Fork River in such a way as to maintain its eligibility for "wild and scenic" status. Additionally, I feel it is imperative that oil and gas development go on outside of designated wilderness areas and away from critical grizzly bear habitat.

Something that I don't yet see happening enough, and yet consider of paramount importance in this rare area of resplendent diversity, is the approach to management of the Shoshone National Forest in the essential context of the contiguous ecosystem, commonly referred to as the Greater Yellowstone Ecosystem. Management in terms of the "big picture" is an approach that I sense is long overdue. A healthy, dynamic ecosystem, along with specific attention to wildlife and appropriate recreation, is what I encourage to be the highest priorty in managing Shoshone National Forest. To remain true to these ends, conflicts between wildlife and other forest uses can and should be resolved in favor of wildlife. 1

As for timber sales and related roads, these can prove detrimental to grizzly bear habitat and should therefore be strenuously avoided in such areas. Any development that has the potential for stress to the grizzly bear, or any large mammal or its habitat, should be deterred as well. 2

I further advocate elimination of roads and timber sales in any areas adjacent to wilderness or along the boundary of Yellowstone National Park. 3

As might be inferred by the foregoing comments, I am disappointed in the proposed plan insofar as it fails to address cumulative impacts of its activities on the comprehensive ecosystem involved. Further, I am strongly opposed to any increase in annual timber harvest, feel that creation of new roads is overemphasized, and don't see that an appropriate range of alternatives has been developed to allow broad comparison of management options. 4

I thank you for this opportunity to share my reactions to what is undoubtedly a stressful and tedious effort and process. Like the greater yellowstone ecosystem itself, you have many demands being placed upon you at once. Please don't ignore this interesting corelation.

Respectfully,

Bruce S. Thompson

Bruce S. Thompson P.O. Box 1197 Dubois, Wyoming 82513

VI-463

165-1 See response to comment 24-1.

165-2 It is recognized that disturbance activities such as timber sales can displace grizzly bears and potentially increase the risk of bear mortalities. Mitigation measures such as provisions for adjacent security areas and stringent controls on timing and administration of activities will be incorporated as necessary in timber sales. As indicated, logging can improve the quality and quantity of bear foods.

Adequate protection measures for the grizzly are in the Grizzly Bear Guidelines and in Standards and Guidelines. Site-specific projects will be analyzed in accordance with NEPA and the ESA.

165-3 In the 1984 Wyoming Wilderness Act, Congress directed that nonselected roadless areas be released for multiple use purposes, and that "buffer areas" were not to be considered adjacent to Wilderness. With this legal direction in mind, some timber sales and the accompanying roads have been scheduled in roadless areas, while other currently roadless areas have not been scheduled. See also response to comments 182-5 and 44-46.

165-4 See response to comment 44-1.

Comment 166

Forest Service Response

RECEIVED OCT 4 1985

FPD-166-W-L-E
Proj. No. Orig Type Appl

WYOMING CHAPTER
SIERRA CLUB
Philip M. Hocker, Box 458, Wilson, Wyoming 83014

1 October 1985

Supervisor Stephen P. Mealey
Shoshone National Forest
P.O. Box 2140
Cody, Wyoming 82414

Dear Steve,

SUPPLEMENTAL COMMENTS OF WYOMING CHAPTER, SIERRA CLUB
on the
MINERALS DIRECTION in the PROPOSED SHOSHONE FOREST PLAN

The following comments supplement the main comments of the Wyoming Chapter, submitted by Meredith Taylor, on the proposed Land and Resource Management Plan, May 1985 draft, for the Shoshone National Forest (the "Plan").

SUMMARY:

We support the Plan direction to recommend disapproval of leases in Situation I Grizzly Bear habitat. However, the Sierra Club opposes the proposal to approve oil and gas leases on all other legally available lands of the Forest. The intent to lease most of the Forest, and to depend on lease "stipulations" for resource protection, is improper. The Plan does not deal adequately with the management requirements for a leasing program, and does not meet the specificity requirements of Federal law and regulations. Management direction for locatable mineral claims, especially in the Sunlight Basin area, is inadequate. 1

LEASABLE AREAS and STIPULATIONS:

We strongly support the Plan's removal of Situation I Grizzly Bear habitat lands from leasing. This protection is vital to ensuring an adequate habitat for bear recovery in the Yellowstone Ecosystem. We recommend that the one-half mile boundary area NOT be leased with no-surface-occupancy; this leasing will prevent flexibility in locating nearby drillrigs for minimum impact on the Situation I areas. While it is not necessary, the Plan should call for a formal FLPMA withdrawal of Situation I areas from leasing, and should examine adjacent Situation II areas to determine sensitive sites which should also be withdrawn. A map of Grizzly Bear habitat designations should be included in the Plan to improve understanding. 2 3

VI-464

pages tightly bound

166-1 See response to comments 68-8 and 12-4. Stipulations attached to operating plans are our initial vehicle for resource protection. These coupled with monitoring are sufficient and proper. NEPA is the specificity requirement of Federal Laws and Regulations. Site-specific environmental analysis are called for in Appendix K. Locatable mineral claims resulting in ground disturbing activities requires a NEPA document and operating plan.

Mineral operations are, by law, a viable use of public land. The mining laws stipulate that lease applications can be made and must be considered for lands not withdrawn. The mining laws also provide guidance on what can or cannot be withdrawn from mineral entry and under what conditions. The procedures outlined in Appendix K of the Forest Plan will afford adequate protection of other resource values during oil and gas exploration and development.

166-2 Sufficient protection is afforded with a no-lease recommendation in Grizzly Situation I areas. In the event of a recovered population, leasing in Grizzly Situation I maybe resumed. Withdrawal is not necessary. Situation 2 areas will be examined through the normal site specific NEPA process described in Appendix K of the Forest Plan.

166-3 We agree. A map is included in the EIS.

Comment 166

Forest Service Response

FPD-166-W-L-E

Shoshone NFMA Comments, 1 Oct 85, p.2:

However, we believe that there are other non-Wilderness areas of the Forest which should not be leased. The impacts of seismic exploration, wildcat drilling, and full-field development on wildlife and on recreation enjoyment should not be permitted in sensitive areas. Specifically, all 3b Management Areas (Primitive Recreation Unroaded), and all areas of Crucial Preferred Winter Range and Wildlife Unique areas, should be removed from leasing entirely. If they are not removed from leasing, leases in 3b areas should only permit helicopter access. More study should be given to removing other areas from leasing. **4**

166-4 See response to comment 12-4.

INADEQUATE MANAGEMENT DIRECTION:

The management direction given by the Plan for oil and gas lease review and administration is inadequate. It does not provide specific guidance for Forest Service decision-makers in the future, and it screens lease approval decisions from the public, preventing meaningful public input to the lease review process. **5**

166-5 We disagree with your assessment of management direction and public involvement in the leasing process. See Appendix K of the Forest Plan.

Other than in Griz I, the general direction of the Plan is to lease everything for oil/gas, and depend on lease stipulations for varying degrees of future protection. That future protection, as proposed, may range from almost no limits to a total ban on surface occupancy on the leasehold area. **6**

In effect, this means that the Plan does not give direction for future leasing. Lease review decisions are left to the future.

166-6 Stipulations provide the base level of protection. Subsequent operations and activities require operating plans and environment assessments that afford the site-specific level of protection needed for the proposed activity. Specifics of leasing directions are best left until after site specific environmental analysis that can only be done after an exploration or development proposal is made.

The Plan should state which areas of the Forest will be leased, and what stipulations will be applied to each specific area. General directions, such as "in this kind of area (unlocated) we would apply that kind of stipulation...", are NOT adequate. Reliance on that direction prevents meaningful public participation, because the public cannot tell what lease terms would apply to a specific area of ground. This specific instruction should be displayed in a Forest-wide map at 1/2" to the mile scale, showing all areas to be leased and all non-lease areas. Areas to be leased should be coded to show what specific stipulations would apply. **8**

166-8 Plan, Appendix J and Plan, Chapter III under Management Prescriptions (yellow pages) describe lands available for leasing. A table of lands available for leasing has been added to Plan, Chapter II in the Minerals section. Plan Appendix K calls for a full NEPA process of public scoping for each lease or group of leases proposed. This process is best accomplished when the leases are proposed so that current issues and concerns are addressed.

Management Situation:
Description of the Management Situation for Minerals (pp.II-64 to 67) is not sufficient to form a basis for analysis. A map of at least 1/4" to the mile scale, showing the location of all currently valid oil/gas leases on the Forest and their stipulations, should be included in the Plan. More detailed **9**

166-9 This information is maintained in the Forest's working files, which are too voluminous to be included in the Plan or EIS doucments. These files are available for inspection by interested parties. Official records for mineral leasing activities are maintained by the Bureau of Land Management.

Comment 166

Forest Service Response

FPD-166-W-L-E
Proj. No. Orig Type Area

Shoshone NFMA Comments, 1 Oct 85, p.3:

information should be given on the extent of locatable mineral development, particularly in historical mining areas (Kirwin, Sunlight Basin, etc.). Is commercial extraction underway or expected? Is activity limited to occasional prospecting? | 9

Forest Direction:
The Forest Direction section of the Plan (pp.III-71 to 87) does not give specific direction to future management. There is not a SINGLE Standard or Guideline for management of mineral activity in these sixteen pages! Comparison of this lack with the timber sections, full of Standards and Guidelines, shows a lack of attention in the Plan to mineral management. | 10

166-10 We agree that the standard and guidelines for mineral management are lacking, however this material is covered in Plan, Appendices J and K. Minerals management direction has been rewritten.

Direction G01(1)(b) is improper. Mineral activities in designated Wilderness or Congressionally-designated WSAs should call for restoration of disturbed lands to a fully natural condition, indistinguishable from surrounding natural areas. Proposed operations which cannot be so restored should not be approved. Restoration to "as near as practical to ... natural condition", as the Plan proposes, is NOT an adequate requirement. | 11

166-11 The Wilderness Act, Section 4(d)(3) says, "as near as practical to ..."

We support the Direction to recommend against leasing and exploration permitting in Congressionally-designated Wilderness Study Areas (G02(2)(c).

Management Prescriptions:
There is generally no discussion of minerals management intent or policy in the Management Prescriptions. This makes it impossible to see whether minerals management is coordinated with other resource values. | 12

166-12 Refer to Chapter III, white and blue pages of the Plan for how minerals coordinate with other resources. Also refer to Appendix J.

Appendix "E":
The texts of proposed lease stipulations in this section demonstrate the underlying vagueness of the Plan's direction. Some of these stipulations MAY prevent any surface activity on a lease. If that is the intent, the stipulation should include a specific statement that "Application of this stipulation may prevent any surface-disturbing activity in any area covered by this lease." Enforcement of lease stipulations has been very difficult in the past. | 13

166-13 Refer to Supplement F in Appendix E of the Plan.

However, we recommend that conditional stipulations not be relied upon. The Forest Service has attempted to promote "CRS" or Conditional Rights Stipulations elsewhere. They are not acceptable to mineral industry or conservation and wildlife interests. Many of the proposed stipulations in Appendix "E" may be, in effect, CRS stipulations. | 14

166-14 No conditional rights stipulations are currently being used.

Comment 166

Forest Service Response

FPD-166-W-L-E

Shoshone NFMA Comments, 1 Oct 85, p.4:

REQUIREMENTS OF LAW and REGULATIONS:

The vagueness of the Plan's direction on minerals management makes it impossible for the Plan to satisfy the requirements of Federal law and regulations. Instances of this shortfall include, but are not limited to:

National Forest Management Act Regulations, 36 CFR Part 219, require balancing of mineral values with renewable resource values (219.1(b)(2)); this balancing cannot be done in a Plan which does not specify the types of leases which will apply on specific areas of ground. Regulation 36 CFR Part 219.22 requires recognition of the potential need for withdrawal of areas from development. The Plan does not meet this requirement, either for leasable or locatable minerals. Sensitive areas of the Forest should be identified in the Plan and recommended for withdrawal. All Forest roads must be planned to re-establish vegetative cover within ten years (219.27(a)(11)); all leases should contain a stipulation to this effect. **15**

166-15 See response to comment 68-5.

Recent Federal Court decisions in Sierra v. Petersen and Connor v. Burford have clarified the requirement that oil/gas leases may not be issued without a prior study of the full environmental consequences of the activities to be permitted under the leases. Conditional stipulations do not serve to evade this need. This Plan does not give adequate specifics of lease decisions to be approved, and therefore cannot study the impacts of those decisions. If this Plan is not improved, a Supplement amending the Plan must be prepared, with a full EIS, before any leases may be processed. The proposal to do area-by-area environmental assessments is not adequate, as the full Forest-wide cumulative impacts of leasing are not adequately covered in that process. **16**

166-16 The Forest Plan does not attempt to analyze nor disclose effects of particular exploration and development opportunities. As stated in the Errata Sheet to Appendix K of the Proposed Plan (which has been incorporated into Appendix K of the Forest Plan). Site-specific environmental analysis including scoping and cumulative effects analysis will be completed for each proposal or group of proposals. Whether or not an EIS is prepared depends upon the significance of possible effects as determined by the environmental analysis.

CONCLUSION:

Because the treatment of leasing and of the management of locatable minerals is so inadequate in this Plan, a revised draft should be prepared and circulated for public comment which meets the criteria established in these comments.

Thank you for the opportunity to comment. I hope these comments help the Forest to develop a useful and sound Management Plan for the future of the Shoshone National Forest.

Sincerely,

Philip M. Hocker
National Treasurer, Sierra Club
for the Wyoming Chapter.

Comment 167

Forest Service Response

RECEIVED 4 1985

FPB-167-F-L-S
Proj. Oct. 1, 1985

Box 2127 S
Riverview Ct.
Riverton, Wyo. 82501

Supervervisor
Stephen P. Mealey
Shoshone National Forest
P.O. Box 2140
Cody, Wyo.

Dear Sir:

Thank you for the open meetings & work you have done to help the public understand your forest plan.

I am concerned with the timbering which is scheduled to happen in the Du Noir area. (Actually clear cuts in any area are questionable) I have watched some of the clear cuts for 25 yrs. & have seen some healing - but over all I think it is very destructive. I realize L.P. has a huge mill & has to keep the timber coming, but I feel there are less destructive ways to manage timber than clear cuts - Some of the smaller operations do much less damage.

I would hope that the wildlife habitat is being considered, as I feel that wildlife is a [illegible] that is not renewable & the habitat

1 167-1 In the 1984 Wyoming Wilderness Act, Congress directed that nonselected roadless areas be released for multiple use purposes, and that "buffer areas" were not to be considered adjacent to Wilderness. With this in mind, the Wolf Creek timber sale has been included in the Final Forest Plan. Planned sales between Five Mile Creek and the Dunoir Special Management Unit have not been included in the Final Forest Plan; this has been allocated to Management Area 3A rather than Management Area 7E. No logging or roadbuilding will take place in the Dunoir Special Management Unit. Most of the planned timber sales are scheduled for shelterwood and selection harvest rather than clearcutting. See also response to comment 44-46.

2 167-2 Habitat for wildlife is a primary emphasis of this Forest Plan. Wildlife is a renewable resource!

is critical to its survival. Since so much of our lifestyle is based on hunting & fishing & enjoying the outdoors — and Wyo. is unique in having this resource for the whole country — I would hope Wildlife would be a great priority. 2

I would also caution against roads — because they always lead to people driving around & then the animals go away.

Thank you for your time.

Sincerely,

Judy Isberg

RECEIVED
SHOSHONE NATIONAL FOREST
OCT 4 11 07 AM '85
U.S. FOREST SERVICE
CODY, WYOMING

Comment 168

RECEIVED OCT 4 1985

FPD-168-F-L-C
Proj. No. Orig. Type ATTN

October 2, 1985
119 W. Jackson Avenue
Riverton, WY 82501

Supervisor Stephen P. Mealey
Shoshone National Forest
P.O. Box 2140
Cody, WY 82414

Dear Sirs,

We would like to express our feelings regarding the proposed Shoshone National Forest Plan. We are both native Wyoming residents and with our children are avid forest users.

We would like to see the Shoshone National Forest be managed for the benefit of the wildlife and for recreational uses. Specifically, we are opposed to road construction in currently roadless areas, and to increased timber sales throughout the forest, most especially above Sinks Canyon. We feel that lumbering in the Sinks will have a profoundly negative effect on the scenic and recreational qualities of an area that is heavily used currently for recreation. 1

We do not agree with the premise of the Plan that increased timbering and the accompanying roads will improve either wildlife habitat or recreational use. I have visited with several game biologists on this topic and have been assured by them that the limiting factor for game herds in the Wind Rivers is the critical winter range, not lack of summer forage, thus timbering would have no benefit. It would instead, through extra road pressure, have an adverse affect. 2

We also feel that there is adequate road access in these areas presently for recreation. The recreational value in this area could conceivably decrease with more roads as its scenic qualities would suffer and the extra pressure force game further into the mountains. 3

We would like to express our pleasure that the Clarks Fork is being considered for wild and scenic river status and urge that it be so designated. It is a truly magnificient river, very deserving of this protection. Further we are pleased that grizzly bear habitat is being given exemption from oil and gas development. We have followed for many years the plite of the grizzly and are confident that if these great bears are not to become extinct soon, they must have wholehearted protection from timbering pressure and mineral developement. We urge you to continue your support for grizzlies by protecting critical habitat from oil and gas development and further, that you protect it from timbering and road pressure as well. 4

Forest Service Response

168-1 See response to comment 44-46.

168-2 Timbering in transitional areas between summer and winter ranges should increase habitat diversity and thus in may instances delay movement on to the critical winter range areas, thus relieving some of the pressure on these areas.

168-3 In response to numerous concerns, the number of acres managed for timber harvest and the resultant amount of roads has been reduced in the final plan. In the next fifty years, the plan direction calls for only eighty miles of new road construction which will be open to the public. There will be an additional 120 miles of existing road which will be improved, and will remain open to the public. An additional 150 miles of new road, and 255 miles of reconstructed existing roads will be closed to the public within the 50 year period. Road construction and reconstruction figures have been corrected in both documents. See also response to comments 182-5, 44-46 and 33-9.

168-4 See response to comments 13-1 and 68-8.

Comment 168

Forest Service Response

FPD-168 - F - L - C
Proj. No. Orig Type Area

To summerize, we would like to see conflicts of use for the Shoshone National Forest be resolved firmly in favor of wildlife.

Thank you for your consideration of our views.

Sincerely,

B. Weldon Shelley

Sherry Shelley

Comment 169

FPD-169-O-L-C
Prep No. Orig Type Affil

RECEIVED OCT 4 1985

Hancock Ranch

Suite 100 Canyon Center
1881 North Street
Boulder, Colorado
80302

Oct 1, 1985

Dear Steve,

Haven't had a chance to visit with you since you OK'd the telephone line for the ranch.

I'm writing about the proposed Clark's Fork Plan. I guess I was neutral about the plan untill I spent two weeks this September wandering through Reef Creek, Russel Creek One Mile, Pilot, Crandell and Table Creek Drainages looking for elk with my bow.

My feet are still peaking from the bruses! That trip, exploring much of the Clark's Fork Valley on foot and horseback convinced me The area is too fragile for the proposed plan.

Take the timbering on Reef Creek, for example. Many say old cuts promote feed for wildlife. I sat on top of the ridges overlooking those cuts four mornings and evenings + watched one moose drift through the area. Saw a lot of moose and elk in other areas, but not in the timbered area. 1

You should take a look at the newly timbered area. It's a mess. How can we allow timbering the middle of a trail (Reef Creek)? AND allow such a mess that you can't get a horse through and up the trail without hacking downed timber out of

Forest Service Response

169-1 Reef Creek has a considerable number of Elk and Moose - Research has shown that "proper" timber harvest can and does enhance big game habitat.

Comment 169

Forest Service Response

FPD - 169 - 0 - L - C
Proj No. Orig Type Affil

Hancock Ranch

The way.

Several Lumbermen have told me the timber is marginal.

665 miles of roads through that area would create havoc on the eco-system that could not rebuild for generations. 1

Steve, before Tish + I bought the Howard place we looked all over the United States for something like the Clarks Fork Valley. There aren't any!

I encourage you to manage the Clarks Fork Valley as a part of the greater Yellowstone eco-system and that wildlife and nature be given favored status in any timber, gas or oil development. 2

I'm dead set against the rape of this valley.

Don't know about you, but I've got plans for grandchildren and great grandchildren. God willing, and with your help perhaps there will be a pristine Clarks Fork Valley for future generations to enjoy.

Kindest regards,

John Wayne

VI-473

169-2 Wildlife habitat was a prime consideration in design of alternatives and prescriptions. Standards and guidelines for design and execution of individual projects contain provisions to consider and protect wildlife habitat. See also response to comment 24-1.

Comment 170

FPD- 170- O - L - C
Proj No. Orig Type Affil

THOMAS C. SAVAGE
10 CROCUS LANE
NORTH OAKS
SAINT PAUL, MINNESOTA 55110

Oct 2, 1985

Supervisor Stephen P Mealey
Shoshone National Forest
P. O Box 2140
Cody, Wyoming 82414

Dear Mr Mealey.

I am very much concerned about the Forest Service's plans for the Shoshone National Forest, and its potential effects on wildlife, particularly the grizzly bear habitat.

I urge you to keep the construction of roads to a minimum - with no roads or logging in potential wilderness areas, to withdraw such areas from oil and gas development. And to manage the Clark Fork River to maintain its eligibility for wild and scenic status.

Sincerely yours,

Tom Savage

Forest Service Response

170-1 The Shoshone National Forest is 57 percent wilderness. The Wyoming Wilderness Act of 1984 specifically mentions release of lands not designated as wilderness for multiple use, specifically condemns the concept of nonwilderness buffers around designated wilderness, and states that lands not designated as wilderness need not be managed to preserve wilderness character. Many of the nonwilderness areas are protected from development because of being critical for wildlife, unproductive for wood fiber production, or critical for visual corridors. Regardless of entry into a few of the many remaining roadless areas, the Forest will remain overwhelmingly unroaded and more or less undeveloped. Our charter is to manage for multiple-use, not just preservation.

The General Mining Laws guide what can or cannot be withdrawn from mineral entry and under what conditions. We direct your attention specifically to Plan, Chapter III in the blue pages under Mining Law Compliance and Administration (General Direction 1C and 2) and Minerals Management Oil and Gas and Geothermal (General Direction 1). All direction found under Minerals Management, supplemented by Plan Appendix K, is intended to protect existing and proposed uses of the land for other resources thereby avoiding the need for withdrawal. If exceptional situations arise, or existing direction is shown to be insufficient, the option of withdrawal remains.

Mineral operations are by law, a viable use of public land. Our charter, provided by Congressional action, is to manage first according to law, and not strictly according to variable market pressures. The mining laws stipulate that lease applications can be made and must be considered for lands not withdrawn. The Forest Plan was selected in large part because it allows mineral activities while recognizing and maintaining the values of clean water, stable wildlife populations, and recreation opportunities which are of primary importance to many Forest users. The Forest Plan affords adequate protection of popular recreation areas, critical wildlife habitat, and other such resource values through application of stipulations and recommended operating procedures. Protection may be in the form of seasonal restrictions or no-surface-occupancy stipulations (see Appendix K of the Plan).

One consideration here is that a lease may never result in actual drilling activity; historically, a low percentage of leases are explored or developed, due in part to market fluctuations and uncertainties.

The Proposed Plan incorrectly states that we can apply for an extension of the protection period for the River. It is contingent upon an act of Congress to protect the River either by including it in the Wild and Scenic River System or by providing additional temporary protection. It is uncertain at this point whether the Clarks Fork of the Yellowstone River will become a part of the National Wild and Scenic Rivers system. The Forest Service and the Administration are in favor of the River's inclusion. Management activities that are within the discretion of the Forest Service will be designed to maintain the River's eligibility. Other activities that are presently within the discretion of agencies such as BLM (minerals) or Federal Energy Regulatory Commission (hydropower development) could affect eligibility characteristics of the Clarks Fork. In the event such developments are proposed, we would recommend denial to the appropriate agency, until Congress acts. See also response to comment 97-1a.

FPD - 171 - P - L - B
Proj. No. Orig Type Appl

Mr. Don Schmalz
Thorofare Outfitting
P. O. Box 604
Cody, Wyoming 82414

October 2, 1985

Mr. Steve Mealey
Forest Supervisor
Shoshone National Forest Bldg.
Cody, Wyoming 82414

Dear Sir:

As a Rancher, Outfitter, past Lodge-owner, Sportsman and interested Park County citizen, I feel I am compelled to comment on this so called "50 year plan."

My first knowledge of such a plan came sometime in June, when friends of mine told me they had received copies from U.S.F.S. of a management plan to be, when drafted, a Bible for U.S.F.S. personnel to use for the next 50 years. 3

The time of year that this plan came out for comment was very untimely for me and others in my profession. As a Board member of the Wyoming Outfitters Association, I can tell you we have not had a chance to meet on this issue because of the time of year. I am sure we would have had a special committee formed to comment on this very important document. The same goes for the Cody Country Outfitters Association, of which I am the Vice President. Outfitters have approximately 4½ months to make their living, as it is a seasonal business. Our comment period comes at this same time. 1

I feel, for something this critical to our profession and livelihood, at least the comment period should be left open until the end of 1985. This would give us a little time to try to study this "vast" document and to comment efficiently.

I did not receive a copy until late August, and have been trying to read it in between hunts ever since!

If for some reason this comment period cannot be extended, I feel I must comment on the plan anyway, with my limited knowledge of what is contained in it.

There are many various areas in my region (North Fork, Shoshone River) which I have fought for repeatedly in the past 8-10 years, that should be

171-3 Wording has been changed and clarification added to both the Plan and EIS to emphasize that the Plan provides direction for the next ten to fifteen years only. The Plan will be completely revised within fifteen years.

171-1 Starting in 1969, input from individuals, groups and other agencies was sought in development of the Plan. This included close coordination with the Wyoming Game and Fish Department and many local citizens. A series of meetings was held in the Spring of 1984 to brief interested individuals, groups and agencies as to how planning was being done. In the fall of that year, the public was invited to inspect all options being considered for each part of the Forest and express their ideas concerning these. As documented in Chapter IV and Appendices B and F of the EIS, many individuals, groups and agencies did participate in these activities and were directly involved as part of formulation and analysis of alternatives.

The public was given repeated opportunity to give input on the proposed plan in general and for specific areas. There have been numerous meetings over the last two years involving the Plan all of which we announced in newspapers and on radio stations. Newsletters have been sent announcing availability of personnel and planning materials and inviting concerned parties to get involved.

Comment 171

FPD-171-P-1-B
Proj. No.

Mr. Steve Mealey
October 2, 1985
Page Two

set aside for wildlife, as they are so crucial to the survival of these herds, as wintering, breeding, lambing and calving areas for our Big Horn Sheep and Elk. These areas should have been part of the Wilderness system many, many years ago because of their importance to our wildlife. Instead, they are now being exploited for their timber, minerals, and roaded recreation opportunities. This is very wrong! I am strongly against any more roads, timber cutting, and the continued exploration for oil in these critically important wildlife areas. Without areas such as Trout Peak, Jim Mountain and the Elk Fork of the Shoshone River being left primitive, these wildlife species cannot survive. 2

Respectfully,

Don Schmalz

VI-476

Forest Service Response

171-2 The major purposes and responsibilities of the Forest Service are stated primarily in two Federal Laws, the Multiple Use Sustained Yield Act of 1960 and the National Forest Management Act of 1976. These laws clearly direct the Forest Service to provide, as appropriate, on National Forest System lands for all the multiple uses. Accordingly, the goal of Forest Service planning is to produce plans which provide for multiple use and sustained yield of products and services and, in particular, include coordination of outdoor recreation, range, timber, watershed, wildlife and fish and wilderness (16 U.S.C. 1600) in a way that maximizes long-term net public benefits in an environmentally sound manner (36 CFR 219.1). In short, the primary planning goal requires production of goods and services which assures coordination of resources and maximizes net public benefits.

Wilderness is but one of several multiple use values to be provided on the Shoshone. The suitability of the Forest for wilderness has been evaluated with the result that approximately 57% of the Forest's roughly 2.5 million acres have been designated as wilderness. The most recent wilderness additions occurred in 1984 as a result of the Wyoming Wilderness Act. This act also directed the release of nonselected areas for multiple use management. Forest Plan direction for these released areas as well as other multiple use management areas is to emphasize production of non-commodities while maintaining historic levels of production of commodities. This philosophy was chosen in recognition of the value of the Shoshone to the American public in terms of wildlife; high quality, low density recreation; and outstanding scenic values as well as its role in the Greater Yellowstone area. Production of commodities on the Forest as proposed in the Plan, is done under standards which are designed to enhance non-commodities as much as possible. For example, standards for timber harvests including cut block size, dispersion of cuts, density of roads and timber road management are designed to use commerical timber operations to improve cover to forage ratios for wildlife as well as improve the distribution and amount of structural and vegetative diversity in a way that allows for enhanced recreation access to the Forest when appropriate as well as visual diversity. Because all harvests in the Plan are above cost sales, they provide a mechanism for improving vegetative communities on the Forest, improving wildlife habitat and improving recreational opportunities in a very cost efficient manner. See also response to comment 44-46.

Comment 172

RECEIVED OCT 3 1985

FPD - 172 - F - L - G
Proj. No. Orig Type Affil

Shoshone Forest North of Wyoming
Game + Fish EAST FORK SIX WINTER RANGE

Areas

2A Indian Ridge

Present road in need of seasonal closure (especially during hunting season when wet conditions exist. Water bars would prevent much of the use [illegible] by 4x4 vehicle traffic

Pines are [illegible] of pine beetle infestation needs to be cut + burned to prevent further spread.

Area west along Indian ridge could be [illegible] to [illegible] Big Horn Sheep use.

3A. Bear Creek Drainage

Rangeland along Bear creek is heavily used by elk during the winter months. Present cattle grazing pressure is heavy on benchs along creek. Suggest removal of livestock grazing for 2 years + complement use of a range rather to increase grass production by capturing needed moisture + decreasing forbs.

Forest Service Response

1 172-1 In the past, road maintenance has been conducted in the Indian Ridge area. We agree that more maintenance is necessary on the road. Unfortunately, with limited budgets, we must put the dollars on more important roads. The Forest Plan calls for a greatly increased road maintenance budget.

2 172-2 We realize the importance of forage for elk along Bear Creek. The standards and guidelines in the Plan for grazing will be closely adhered to. The Forest Service will continue to cooperate with the Game and Fish to improve forage in the East Fork country.

Comment 172

Forest Service Response

FPD- 172 F- [illegible] - G
Proj. No. Orig. T. [illegible]

[illegible]

Proposed plan is good.

4B west of Indian Ridge

Big horn Sheep habitat could further be enhanced by burning scattered patches of timber, especially in rocky outbreaks

2E North of Spring Mtn.

Disagree with harvest of timber. There is adequate forage for elk & deer in areas adjacent. Dense timber is favored for cover during hunting season.

4

Respectively submitted

Lee Brandt
E. East Fork manager
Wyo Game & Fish

172-4 Forest Standards and Guidelines and Management Area Prescription establish criteria for the maintenance of wildlife habitat, including cover requirements. The Spring Mountain timber sale will maintain adequate wildlife cover, and has been retained in the Final Forest Plan.

Comment 173

RECEIVED OCT 3 1985

OCT - 2 1985

FPD-173-P-L-C
Proj. No. Orig. Type Affil

837 Canyon Ave.
Cody, Wyo. 82414
October 1, 1985

Mr. Ron Wilcox
District Ranger
Shoshone National Forest
225 West Yellowstone Ave.
Cody, Wyo. 82414

Dear Mr. Wilcox,

I attended the meeting at the Cody Convention center that addressed the issue of timber sales on the upper Green Creek area of the Shoshone National Forest, Wapiti District. The opening up of this area to lumbering operations would improve about two miles of existing road and would allow the constructing of at least two more miles of new road. This upper area has for years been restricted to foot or horseback travel only preventing the public from using motor vehicles. How can the forest service possibly consider logging in the Green Creek area and allowing the construction of new roads to a private firm when it has for years been closed to the public for motor vehicle use?

Our family has a cabin on lower Green Creek located .6 miles above the highway. During late August 1983 the upper Green Creek area experienced a sudden heavy rain storm causing the creek to rise dramatically. This heavy run off, even with the natural veg- 1
caused extensive damage to the lower Green Creek area. The culvert located at 1.5 miles above the highway was completely washed out. There were boulders that rolled down the creek with an estimated weight of 2000 pounds as if they were merely marbles. This sudden cloud burst took out a foot bridge at my place and caused extensive damage at Hansen Murray's place. Hansen had to hire Donny Legg for several days to relocate the stream, putting it back into its original channel. Had there been any less means to hold the soil and moisture in place, Hansen would have surely had his home dstroyed.

My major concern is that if the upper Green Creek area is lumbered and new roads built or improved there wont be the natural vegestation that is so vitally important to prevent errosion. The water shed history of this area shows that we can expect a major flash flood about every ten years. It does not seem to be prudent to allow any lumbering in the Green Creek area knowing the fragile soil conditions and the heavy rains that do occur.

One last concern of mine is the over grazing that has been allowed to continue on Table Mountain due to cattle. This area 3
is so over grazed that there is not sufficient grass for wintering elk let alone a few horses during hunting season.

Sincerely,

Donald R. Frisby

Forest Service Response

173-1 The Forest Plan shows no extensive timber sales in the Blackwater Creek and Green Creek area. During the first decade the District plans to sell approximately 200 MBF of small Ranger Sales District-wide consisting of post and poles, fuelwood, thinning, house logs, salvage and personal use Christmas trees. The sales in the Blackwater and Green Creek areas will utilize the existing road systems and skid trails. No road construction is anticipated in the first decade.

173-3 Short range plans are for each Ranger District to conduct a minimum of two range analyses each year and two updated Range Management Allotment Plans. Based on allotment analyses, any major changes proposed to either reduce or increase domestic livestock stocking and/or wildlife herd quotas on an allotment will follow prescribed Forest Service Manual procedures before implementation can take place.

Comment 174

Received 10/2/85

Leonard Carlman
P.O. Box 2962
Jackson, WY 83001

FPD - 174 - W - L - C
Proj. No. Orig Typo Affil

Mr. Steve Mealey
Supervisor, Shoshone National Forest
Box 2140
Cody, WY 82414

Dear Mr. Mealey;

Please consider this letter as a response to your draft Forest Plan for managing the Shoshone National Forest.

I am a strong supporter of yours. Although my knowledge of you and your stewardship of the Shoshone comes mostly from the news media and from conversations with friends who know you better than I, what I've heard and what I've read are that you a proud advocate of managing with due consideration for untraditional values - wildlife, recreation, and scenery.

I've also heard that you are in a fishbowl of sorts because of your background as a wildlife biologist. I urge you to make the changes in the Forest Plan which may err a bit on behalf of the wildlife resource, but which at the same time will prevent irreversible loss of a unique natural resource. In the case of the Grizzly Bear, I understand that in the few non-wilderness areas which are in Situation I class, you are recommending withdrawl of oil and gas leasing and development. Until the Grizzly Bear is removed from the list of threatened species, I urge you to manage non-wilderness lands in a roadless conditior. No timber harvest; such lands should be removed from the timber base. 1

Frankly I was surprised to read that your Forest Plan assumes that wildlife and recreation take on a higher Net Present Value when roads are built into roadless areas. I cannot believe that you don't know better than that; surely this mistake was made by some greenhorn economist in Denver or Washington. Please use your position as Supervisor to overrule this obvious, egregious, and unsupportable error. None of the alternatives should use this kind of bad information. 2

One area of special importance to me is the DuNoir; please do not schedule any new roads or timber harvest or oil and gas development in the DuNoir Valley. Because I suspect that L-P in DuBois wants to open up all of the following areas to timbering, and because I think there must be support for more balanced management, please accept my recommendation that Deep Lake, Sawmill Creek, North of Sinks Canyon, the Worthen Meadows area, Fiddlers Lake to Christina Lake, and other important wild areas around Yellowstone Park all be managed for their value for wildlife and recreation first and perhaps not at all for the scrawny timber that grows there. 3

Forest Service Response

174-1 See response to comments 22-5 and 68-8.

174-2 See response to comment 44-43.

174-3 In the 1984 Wyoming Wilderness Act, Congress directed that nonselected roadless areas be released for multiple use purposes, and that "buffer areas" were not to be considered adjacent to Wilderness. With this legal direction in mind, some timber sales and the accompanying roads have been scheduled in roadless areas, while other currently roadless areas have not been scheduled. See also response to comments 182-5 and 44-46.

Comment 174

FPD-174-W-L-e
Orig. Type Affil

My last point has to do with the Shoshone's role in the Greater Yellowstone Ecosystem. To my understanding the Greater Yellowstone Coalition has not formulated its own master plan for managing this vast area; instead it has urged today's land managers to incorporate what they perceive as necessary measures to insure that future generations will also know the Greater Yellowstone. While I support the Interagency Grizzly Bear Team and hope that you are a dominant figure on that team, let me encourage you to draw on your own personal knowledge of what improvements could be made in the current system for managing this area. My only suggestion may be perceived as impractical by you, but I think that with six National Forests around Yellowstone N.P., it would make sense to carve out an ecologically logical Forest Service Region to oversee this area. Although the current Regions are numbered one to ten, there is no Region 7. I challenge you to be the first Supervisor around the Greater Yellowstone to propose and advocate in your Forest Plan this change in Regional boundaries.

– Call it "Lucky 7" –

Very truly yours,

Leonard Carlman

Comment 175

Forest Service Response

Postmarked 10/3/85

FPD - 175 - 0 - 1 - B
Proj. No. Orig Type Addl

The Gem Shop, Inc.

Eugene Mueller, Pres

W64 N723 Washington Avenue
Cedarburg, Wisconsin 53012
414/377-4666

Custom Cabbing and Faceting
Rough Gem Material
Import — Export
Cut Stones

October 2, 1985

USDA
Forest Service
225 West Yellowstone Ave.
P.O. 2140
Cody, Wyo. 82414
Att: Forest Supervisor - Stephen Mealey

Summary of the Draft Environmental Impact Statement and
Proposed Forest Plan
Shoshone National Forest

Dear Mr. Mealy:

While the preferred alternative of the Forest Plan generally allows for enhanced recreational activities, the Summary Draft fails to recognize one of the forests recreational users. The director of Recreational Management for the USDA has stated that rock collecting is a valid recreational activity on National Forest lands, and yet the forest service has not directly recognized this recreational use on the Shoshone National Forest. Historically, rock collecting has been the Major Recreational Use on specific areas of the Shoshone National Forest. Over the past several years the recreational opportunity in these areas has been diminished. It is hoped that the Forest Service Management Plan will at the very least recognize this recreational activity and in its management of that plan promote and provide for its enjoyment. 1

Sincerely,

THE GEM SHOP, INC.

Eugene Mueller
President

EM/km

175-1 We agree that rock collecting is a valid use of National Forest lands and there is no intent to curb this activity except in some areas of wilderness where the supply is limited. Because of the value of some types of rock its collection for commercial purposes can only be done under permit or through location under the general mining laws.

Postmarked 9/30/85

September 30, 1985

EPD-176-0-L-C

Stephen P. Medley Supervisor
Shoshone National Forest
P.O. Box 2140 Cody WY 82414

Re: Shoshone National Forest Plan

Dear Sir:

Our immediate National Forest is the Gallatin but we are linked to the Shoshone because both are a part of the wild areas on the periphery of Yellowstone. We write you to urge you to do all possible to keep as much of your forest free of excess human pressures as possible so that future generations will still have an essentially intact wild area to go with Yellowstone Park.

Specifically we are strenuously opposed to more and more roads, even if that means a smaller timber harvest. This intrusion is too much in conflict with wildlife and wilderness values. This country is quite rightly becoming more concerned with the quality of life - and National Forest policy should be in tune.

Thank you for your consideration

Robert J Stevens Jr.
R.T. STEVENS JR
P.O. Box 459
Bozeman MT 59715

VI-483

1

Forest Service Response

176-1 The major purposes and responsibilities of the Forest Service are stated primarily in two Federal Laws, the Multiple Use Sustained Yield Act of 1960 and the National Forest Management Act of 1976. These laws clearly direct the Forest Service to provide, as appropriate, on National Forest System lands for all the multiple uses. Accordingly, the goal of Forest Service planning is to produce plans which provide for multiple use and sustained yield of products and services and, in particular, include coordination of outdoor recreation, range, timber, watershed, wildlife and fish and wilderness (16 U.S.C. 1600) in a way that maximizes long-term net public benefits in an environmentally sound manner (36 CFR 219.1). In short, the primary planning goal requires production of goods and services which assures coordination of resources and maximizes net public benefits.

Wilderness is but one of several multiple use values to be provided on the Shoshone. The suitability of the Forest for wilderness has been evaluated with the result that approximately 57% of the Forest's roughly 2.5 million acres have been designated as wilderness. The most recent wilderness additions occurred in 1984 as a result of the Wyoming Wilderness Act. This act also directed the release of nonselected areas for multiple use management. Forest Plan direction for these released areas as well as other multiple use management areas is to emphasize production of non-commodities while maintaining historic levels of production of commodities. This philosophy was chosen in recognition of the value of the Shoshone to the American public in terms of wildlife; high quality, low density recreation; and outstanding scenic values as well as its role in the Greater Yellowstone area. Production of commodities on the Forest as proposed in the Plan, is done under standards which are designed to enhance non-commodities as much as possible. For example, standards for timber harvests including cut block size, dispersion of cuts, density of roads and timber road management are designed to use commerical timber operations to improve cover to forage ratios for wildlife as well as improve the distribution and amount of structural and vegetative diversity in a way that allows for enhanced recreation access to the Forest when appropriate as well as visual diversity. Because all harvests in the Plan are above cost sales, they provide a mechanism for improving vegetative communities on the Forest, improving wildlife habitat and improving recreational opportunities in a very cost efficient manner. See also response to comment 44-46.

Comment 177

Forest Service Response

FPD - 177 - O - L - B
Proj. No. Orig Type Attn

Amoco Production Company
Denver Region
Amoco Building
1670 Broadway
Denver, Colorado 80202
303-830-4274

Roberta Andersen
Public Lands Coordinator

October 2, 1985

Mr. Stephen P. Mealey
Forest Supervisor
Shoshone National Forest
P. O. Box 2140
Cody, WY 82144

Dear Mr. Mealey:

Amoco Production Company is a subsidiary of Amoco Corp. Amoco Production Company's Denver Region has a continuing active interest in the activities of the Shoshone National Forest. We're pleased to have the opportunity to comment on the Draft LRMP.

We note that of the 2,433,125 acres of forest land, only 385,980 acres are available for oil and gas leasing with surface occupancy. We note, also, that withdrawals total 1,498,145 acres in Wilderness, wilderness study, special management, Research Natural Area, Wild and Scenic River, Grizzly Bear Situation I (outside Wilderness) and the Beartooth Highway.

There is much interest in exploring for oil and gas on the non-Wilderness portion of the Shoshone, but we believe that, despite existing leases and applications for leases, the Forest Service has chosen to make activity so expensive and time consuming that it hopes companies will ultimately be too discouraged to try. We believe the Shoshone, more than any other National Forest, has failed its resource management obligations to the nation, and has chosen to specialize in recreation management. Local input from special-interest recreation groups seems to have had such heavy influence on the Shoshone's management team that it has lost track of the need to provide the nation's consumers with other forest products, including energy resources. 1

While at first glance it appears energy resources were afforded extensive consideration, we have concluded the processes contained in the draft LRMP must have been completed after other resource allocation decisions were already made for all alternatives. The same acreage is available for oil and gas leasing in all alternatives, regardless of mineral potential. It seems clear that oil and gas activity will be allowed only if such activity will not affect any surface resource value.

177-1 See response to comments 68-5 and 68-1.

Comment 177

FPD - 177 - 0 - L - B
Proj. No. Orig Type Affil

We believe the draft LRMP fails to comply with NFMA regulations for minerals (Appendix D, p. 41). Information necessary for tradeoff analysis and conflict resolution has been made available to Shoshone personnel, and it has been used to determine how and where constraints should be applied against the energy industry to avoid any possible surface/subsurface resource conflicts. 1

We are at a loss to understand why oil and gas leasing is recommended for denial in non-Wilderness Situation I Grizzly Bear habitat. It is even more mystifying why it is the only opportunity denied outright. Other activities, it seems, can conform with the "1979 Grizzly Bear Guidelines," and the Endangered Species Act. Many other surface activities occupy more surface acres and, in the short term, cause greater disruption, but they are not prohibited. We agree with the Rocky Mountain Oil and Gas Association's comment that this constitutes a "withdrawal" under the Federal Land Policy and Management Act. Shoshone personnel are required to meet reporting obligations under Section 204 of FLPMA, or modify their recommendations in the draft plan. 2

Perhaps the greatest bias in the draft plan is contained in Appendix D of the accompanying DEIS. The Total Lease Bid Value (Million $/Decade) of Alternative A, Current Direction, is calculated to be $126 million. The Preferred Alternative D has a calculated value of only $80.3 million. The difference is $45.7 million lower than continuation of current management, and $49.7 million lower than the RPA alternative. While no one knows for certain that any of these numbers represents an accurate projection, the clear direction away from oil and gas exploration and development is obvious. 1

We believe the requirements to use airlift or non-motorized access represents an unreasonable disincentive to energy companies. Helicopter mobilization of drilling equipment, supplies and personnel is expensive and risky. For Forest personnel to assume that it is a proper "standard" practice because the Shoshone is "special" is unrealistic. Moreover, in applying such restrictions on the unroaded acreage of the Forest, the Plan shows no evidence that the Forest Service has even considered less restrictive alternatives before deciding to impose them. 3

It is important that the final plan be amended to show sufficient justification for application of the airlift stipulation, and to show clearly that less restrictive stipulations were considered, but rejected because they did not adequately protect the public interest.

We believe it is time for the Forest Managers on the Shoshone to come to terms with technological advances, engineering possibilities, and the environmental protection record of the oil and gas

best copy available

Forest Service Response

177-2 The decision to recommend lease denial in Situation I is supported by two environmental analysis documents. In both cases, there were no public comments on these documents which opposed this decision. These documents are the DEIS for Oil and Gas Exploration and Leasing within the Washakie Wilderness and the 1982 Environmental Assessment of Oil and Gas Operations in Grizzly Bear Situation I and II. Further, the decision was supported by the U.S. Fish and Wildlife Service in their formal opinions written for these documents. The U.S. Fish and Wildlife Service recently issued a "no jeopardy opinion" on the Forest Plan. This opinion was partially based on lease denial on Situation I lands.

The decision in the Plan does not constitute a withdrawal for it is a temporary ban on leasing. If Situation I lands were withdrawn, leasing following recovery of the bear would require negation of the withdrawal.

The Plan selected the option of requiring no-lease as opposed to withdrawal because in the event of a recovered grizzly bear population, leasing would again be considered. Further, the cumulative effects studies currently underway might help us understand ways in which oil and gas activities may be accomplished with no effect on the Grizzly. Once the cumulative effects can be predicted, then the Interagency Coordinator Committee could consider the general opening of Grizzly Situations I to leasing and formally consult with U.S. Fish and Wildlife Service.

There are many other resource restrictions in Grizzly Bear Situation I habitat. Timber operations as well as recreational opportunities are limited in these areas.

177-3 Isolated occupancy tracts are areas on the Forest where the soil and landform conditions can withstand normal oil and gas operations without exceeding minimum standards of soil and water resources, but which appear to be inaccessible. They are, in effect, islands where there is no reason to restrict surface occupancy on that particular area, but where there does not appear to be a way to construct a road to that area and still protect soil and water resources. If an area that is suitable for surface occupancy lies adjacent to other such areas and together they form a corridor to an existing road, then it was not considered an isolated tract. This is true even if there is no road in that corridor presently and regardless of the number of miles of new road construction necessary to connect that area to an existing road. In short, isolated tracks are areas where building a road to them using standard technology would violate soil and water minimums. If a road can be built to it, it is not "isolated".

Comment 177

FPD - 177 - 0 - L - B
Proj. No. Orig Type Affil

Mr. Stephen P. Mealy -3- October 2, 1985

industry. The industry has made dramatic improvements and has demonstrated an environmental commitment sufficient to justify leasing in even the most environmentally-sensitive areas. It is bad policy to assume that only damage will occur from oil and gas activities and to apply such restrictive stipulations as to render leases inoperable. This plan emphasizes ways to mitigate damage, limit activity, prevent or control adverse impacts, deny consent, recommend against leasing, and generally maintain maximum control over mineral leasing activity. This is a destructive way to plan for adding to the country's domestic energy and minerals security. The evidence is clear, as seen in the handling of Marathon's North Fork well, that baseball bats are being used for mosquito control. We hope the final LRMP will be modified to reflect the positive aspects of energy and mineral activities, and to encourage exploration and development in areas of, at least, high and moderate potential.

Thank you for considering our comments.

Sincerely,

R. L. Andersen

RLA:sd

Forest Service Response

177-3 (Continued)

The Errata Sheet to Appendix K of the Proposed Plan (which has been incorporated into Appendix K of the Forest Plan) describes how site specific environmental analysis fits into the leasing, exploration, development process. The process outlined calls for a site-specific examination of NSO areas to see if, in the context of a specific proposal, they are truly isolated. This process will be used to minimize any "lost opportunity to discover" by looking at ways to explore or develop without violating other resource standards. The discussion on isolated tracts in Appendix K has been modified to increase clarity.

The concern over isolated tracts has caused a wave of "helicopter paranoia". If after a site-specific analysis, the area is truly isolated, then helicopter access is presently the only means to access. Even the helicopter's tremendous expense, it may very well be cheaper than conventional road construction and subsequent obliteration provided that a road could be constructed without violating soil and water standards. In fact, Willie Legg of Marathon Oil, indicated that the helicopter show on the North Fork may have been cheaper than roading from an exploration standpoint. The fact that there are presently few rigs available that can be mobilized by helicopter would indicate that the current cost may be artifically high. If a demand is demonstrated additional supplies of these portable rigs will probably bring the cost down.

Individual management area prescriptions contain standards and guidelines dealing with transportation systems.

Comment 178

P. Smarked 10/3/85

FPD - 178 - 0 - 4 B
Proj. No. [illegible]

SOCO
Snyder Oil Company

SOCO Plaza, 7th Floor
1800 Glenarm Place
Denver, Colorado 80202
(303) 291-8400

October 3, 1985

Mr. Stephen P. Mealey
Forest Supervisor
Shoshone National Forest
P.O. Box 2140
Cody, WY 82414

Re: Draft Environmental Impact Statement (Proposed) Land and Resource Management Plan

Dear Mr. Mealey:

Please accept the following comments regarding the Shoshone National Forest Draft Environmental Impact Statement and Land and Resource Management Plan:

Snyder Oil Company (SOCO) believes the proposed documents illegally and erroneously discriminate against oil and gas development in the National Forest.

The Multiple-Use Sustained Yield Act states "...nothing herein shall be construed as to affect the use or administration of the mineral resources of National Forest Lands...". Yet, the Forest Plan, which must comply with above act, discriminates almost exclusively against oil and gas development. Alternative "D" allows for only 18% of the area in the Forest to be explored for oil and gas, and then only with onerous stipulations which often require helicopter mobilization. 1

There are areas in the plan where minerals are not even addressed. These occur generally in the Environmental Consequences section, Chapter IV.

The documents propose that Grizzly Bear Situation I Habitat be withdrawn from leasing. Oil and gas leasing is the only activity which is denied outright. Other activities must conform to the "Grizzly Bear Guildelines" 1979, and the Endangered Species Act yet there are no other prohibitions such as the oil and gas no-lease in Situation I Habitat. This act of withdrawing lands from leasing is a withdrawal under FLPMA and can only properly be effectuated through congressional action. 2

There is no indication in the plan as to where travel corridors occur or where roads will be allowed in the forest. The Travel Management discussion addresses, in graph form (Figure III-4), the percent of closure of Forest roads, but does not indicate where they occur. This is especially important in light of the Plan's direction. 3

The issues identification portion under Issues, Concerns, and Opportunities address a polarization and allude to the fact that some local entities are opposed to oil and gas exploration. This, along with the social impact analysis, does not weigh concerns with the number of people affected. The NEPA process is not a voting issue, yet these 4

Forest Service Response

178-1 See response to comment 68-5.

178-2 The decision to recommend lease denial in Situation I is supported by two environmental analysis documents. In both cases, there were no public comments on these documents which opposed this decision. These documents are the DEIS for Oil and Gas Exploration and Leasing within the Washakie Wilderness and the 1982 Environmental Assessment of Oil and Gas Operations in Grizzly Bear Situation I and II. Further, the decision was supported by the U.S. Fish and Wildlife Service in their formal opinions written for these documents. The U.S. Fish and Wildlife Service recently issued a "no jeopardy opinion" on the Forest Plan. This opinion was partially based on lease denial on Situation I lands.

The decision in the Plan does not constitute a withdrawal for it is a temporary ban on leasing. If Situation I lands were withdrawn, leasing following recovery of the bear would require negation of the withdrawal.

The Plan selected the option of requiring no-lease as opposed to withdrawal because in the event of a recovered grizzly bear population, leasing would again be considered. Further, the cumulative effects studies currently underway might help us understand ways in which oil and gas activities may be accomplished with no effect on the Grizzly. Once the cumulative effects can be predicted, then the Interagency Coordinator Committee could consider the general opening of Grizzly Situations I to leasing and formally consult with U.S. Fish and Wildlife Service.

There are many other resource restrictions in Grizzly Bear Situation I habitat. Timber operations as well as recreational opportunities are limited in these areas.

178-3 Isolated occupancy tracts are areas on the Forest where the soil and landform conditions can withstand normal oil and gas operations without exceeding minimum standards of soil and water resources, but which appear to be inaccessible. They are, in effect, islands where there is no reason to restrict surface occupancy on that particular area, but where there does not appear to be a way to construct a road to that area and still protect soil and water resources. If an area that is suitable for surface occupancy lies adjacent to other such areas and together they form a corridor to an existing road, then it was not considered an isolated tract. This is true even if there is no road in that corridor presently and regardless of the number of miles of new road construction necessary to connect that area to an existing road. In short, isolated tracks are areas where building a road to them using standard technology would violate soil and water minimums. If a road can be built to it, it is not "isolated".

Comment 178

FPD 178 - 0 - 4 B

Mr. Stephen P. Mealey
October 3, 1985
Page 2

documents rely heavily on local input of special interest groups disguised as environmental groups. The concerns of groups representing the oil and gas industry were considered as total numbers and not in light of the people and jobs these companies and trade organizations represent. Why is oil and gas not on the same footing as the other commodities? Can clear cutting timber possibly be less impacting than an exploratory well? Polarization occurs when valid public concern is not responded to accurately by the F.S. 4

It is stated that there are 140 lease applications pending recommendation to the BLM. Some of these leases are undoubtedly in moderate or high potential areas. These leases amount to 50% of the present total leases. The document also estimates that there will be from 10-20 Applications for Permit to Drill (APD's) filed in the next year. It can also be presumed that these will be drilled on moderate to high potential areas. If the leasing process does not proceed rapidly and efficiently, there will be no new APD's filed in subsequent years. What mechanism is there for efficient and timely handling of these APD's? 5

Some oil and gas lease applications have been pending for 11 years, and many others to a lesser degree. We believe this violates FLPMA and is a withdrawal of lands which have not been reported to Congress.

In conclusion, SOCO believes these documents to be heavily biased against oil and gas activity, yet in favor of development of other commodities. This prejudice is illegal, unfounded and harmful to local and national welfare.

SOCO sincerely hopes that the final documents address the minerals issue in a more fair and responsible manner.

Thank you for consideration of these comments.

Yours very truly,

SNYDER OIL COMPANY

John D. Amen
Vice President/Land

KEM:mas

Forest Service Response

178-3 (continued) The Errata Sheet to Appendix K of the Proposed Plan (which has been incorporated into Appendix K of the Forest Plan) describes how site specific environmental analysis fits into the leasing, exploration, development process. The process outlined calls for a site-specific examination of NSO areas to see if, in the context of a specific proposal, they are truly isolated. This process will be used to minimize any "lost opportunity to discover" by looking at ways to explore or develop without violating other resource standards. The discussion on isolated tracts in Appendix K has been modified to increase clarity.

The concern over isolated tracts has caused a wave of "helicopter paranoia". If after a site-specific analysis, the area is truly isolated, then helicopter access is presently the only means to access. Even the helicopter's tremendous expense, it may very well be cheaper than conventional road construction and subsequent obliteration provided that a road could be constructed without violating soil and water standards. In fact, Willie Legg of Marathon Oil, indicated that the helicopter show on the North Fork may have been cheaper than roading from an exploration standpoint. The fact that there are presently few rigs available that can be mobilized by helicopter would indicate that the current cost may be artifically high. If a demand is demonstrated additional supplies of these portable rigs will probably bring the cost down.

Individual management area prescriptions contain standards and guidelines dealing with transportation systems.

178-4 The Forest Plan proceeds from Alternative D which is presented in the Environmental Impact Statement. The various alternatives were developed through a scoping process that included consultation with a variety of groups, including those affiliated with the oil and gas industry. (See Chapter VI of the EIS). The alternatives were evaluated through a social impact assessment that again included a variety of concerns, including oil and gas. Alternative D, which restrains oil and gas activities to a degree, was most acceptable in terms of resolving social conflicts (See Appendix F of the EIS). It was also among the most acceptable in terms of environmental effects (See Chapter IV of the EIS). In addition, our internal analysis of oil and gas as a valued resource was accomplished using a procedure that had the full support of our correspondents in the oil and gas industry (see Appendix D, EIS, Oil and Gas Valuation). Use of this procedure and how it was going to be displayed as well as a preview of the draft documents were done with regional representatives of this group. Input from this group was relied on as much as any other local, regional or national group.

The NEPA process does not try to determine which comments were more important than others, or determine which issues were emotional and which were fact. It simply takes the issues and developes a series of alternatives to include the issues raised in the EIS process. It is not a voting process. There is considerable polarization because of the many uses and many users of the Forest. Appendix F has dealt with the social impact analysis with the framework of the alternatives generated by the scoping process.

178-5 Appendix K of the Plan outlines a process for dealing with oil and gas leases and APD proposals. This process is now being used to decrease the backlog of pending leases as well as dealing with new leasing proposals. Developing lease recommendations to forward to the BLM may require a very short Environment Assessment or an EIS depending on the

Comment 179

Forest Service Response

Postmarked 10/3/85

FPD-179-0-L-C
Proj. No. Orig. T. Addl

10/1/85

Mr. Mealy;

I would like to briefly comment on your Forest Plan for the Shoshone National Forest.

First of all let me state that I am in favor of keeping the Clark Fork River eligible for wild and scenic status and the withdraw of all wilderness and other critical grizzly bear habitat from oil and gas development.

1 179-1 See response to comments 13-1 and 68-8.

Next, I would stress the importance of protecting the complete Greater Yellowstone ecosystem. In your planning process the Forest must address the problem of cumulative effects of all activities proposed in this area.

Once grizzly bear, elk and wolf habitat are lost they cannot be recovered - at least not in yours or mine or my children's lifetime. The magnificent nature of the Greater Yellowstone ecosystem is something that cannot be lost to the temporary gains of oil, natural gas or timber production or over grazing by domestic cattle and sheep.

2 179-2 See response to comment 24-1.

Mining, logging, livestock grazing are all important industries that most of us do use everyday, but they cannot become so over important that they neglect the value of wildlife habitat. That is why I'm also against building additional roads to the extent that you enter the now road-less areas of the Forest.

Areas like Deep Lake, Dunoir Valley and

3 179-3 In the 1984 Wyoming Wilderness Act, Congress directed that nonselected roadless areas be released for multiple use purposes, and that "buffer areas" were not to be considered adjacent to Wilderness. With this legal direction in mind, some timber sales and the accompanying roads have been scheduled in roadless areas, while other currently roadless areas have not been scheduled. See also response to comments 182-5 and 44-46.

Comment 179

FPD. 179

Sawmill Creek must be left, basically as they are now. 3

Increasing your annual timber harvest by 10% and building hundreds of miles of new roads will only do great damage to an all ready fragile ecosystem. 4

Thank you for allowing me to comment on your upcoming Forest Plan - I love that area very much and visit it as often as I can. I trust that you and others will make the necessary decisions for the present and the future.

Sincerely, Dawn Phillips

P.O. Box 684
Joseph, ORE.
97846

RECEIVED
SHOSHONE NATIONAL FOREST
OCT 7 11 05 AM '85
U.S. FOREST SERVICE
CODY, WYOMING

VI-490

Forest Service Response

179-4 In response to numerous concerns, the number of acres managed for timber harvest and the resultant amount of roads has been reduced in the final plan. In the next fifty years, the plan direction calls for only eighty miles of new road construction which will be open to the public. There will be an additional 120 miles of existing road which will be improved, and will remain open to the public. An additional 150 miles of new road, and 255 miles of reconstructed existing roads will be closed to the public within the 50 year period. Road construction and reconstruction figures have been corrected in both documents. See also response to comments 182-5 and 44-46.

The Forest Plan will guide management over the next 10 to 15 years and will be revised every 15 years or sooner in response to major changes in information or needs of the American public. Projections over 50 years are provided to portray long term consequences only.

Comment 180

Postmarked 10/3/85

FPD- 180- P - L- E
Proj. No. Orig Type Avail

CODY COUNTRY OUTFITTERS & GUIDES ASSOCIATION

Box 1511
Cody, Wyoming 82414

Sept. 30, 1985

Stephen P. Mealey
Forest Supervisor
Shoshone National Forest
Box 2140
Cody, WY. 82414

Dear Mr. Mealey:

In reply to the proposed Shoshone National Forest Plan and the Scoping Statement I have received from your office.

I feel strongly we do not need additional roads into our National Forest roadless area's. Let us keep the timber sales to a minimum. Our wildlife need the habitat and area's available to them in the years past to survive. 1

The Forest Service is working toward a good management plan in keeping grizzly bear and human to coexist. Why jeopardize this effort if you allow more roads and have additional timber sales in these area's.

Because of this nature, it is wise that the Forest Service withdraw all wilderness and critical grizzly bear habitat in Situtation I and 2 area from oil and gas development. 2

Let us give all our wildlife any and all the assistance required, so that future generation of people will enjoy our National Forest.

I feel the Wyo. Game & Fish Department is doing a good job in their management department. Let us have the Shoshone National Forest do the same.

In regard to your Scoping Statement, there are many issues quoted that will require additional study. Because this is a very busy month of the year for the Cody Outfitters, I will have a committee of our members give this serious consideration, after they become available.

Thank you for allowing us to give our input toward the National Forest Planning.

Sincerely,

Dale Good

Dale Good - President
Cody Country Outfitters-Guide
Cody, WY. 82414

Forest Service Response

180-1 In the 1984 Wyoming Wilderness Act, Congress directed that nonselected roadless areas be released for multiple use purposes, and that "buffer areas" were not to be considered adjacent to Wilderness. With this legal direction in mind, some timber sales and the accompanying roads have been scheduled in roadless areas, while other currently roadless areas have not been scheduled. See also response to comments 182-5 and 44-46.

180-2 Oil and gas leasing is prohibited in legislated wilderness areas, per the Wilderness Act of 1964 as amended.

The decision to recommend lease denial in Situation I is supported by two environmental analysis documents. In both cases, there were no public comments on these documents which opposed this decision. These documents are the DEIS for Oil and Gas Exploration and Leasing within the Washakie Wilderness and the 1982 Environmental Assessment of Oil and Gas Operations in Grizzly Bear Situation I and II. Further, the decision was supported by the U.S. Fish and Wildlife Service in their formal opinions written for these documents. The U.S. Fish and Wildlife Service recently issued a "no jeopardy opinion" on the Forest Plan. This opinion was partially based on lease denial on Situation I lands.

The decision in the Plan does not constitute a withdrawal for it is a temporary ban on leasing. If Situation I lands were withdrawn, leasing following recovery of the bear would require negation of the withdrawal.

The Plan selected the option of requiring no-lease as opposed to withdrawal because in the event of a recovered grizzly bear population, leasing would again be considered. Further, the cumulative effects studies currently underway might help us understand ways in which oil and gas activities may be accomplished with no effect on the Grizzly. Once the cumulative effects can be predicted, then the Interagency Coordinator Committee could consider the general opening of Grizzly Situations I to leasing and formally consult with U.S. Fish and Wildlife Service.

There are many other resource restrictions in Grizzly Bear Situation I habitat. Timber operations as well as recreational opportunities are limited in these areas.

Comment 181

FPD - 181 - O - L - G
Proj. [illegible]

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VIII
ONE DENVER PLACE — 999 18TH STREET — SUITE 1300
DENVER, COLORADO 80202-2413

Ref: 8PM-EA

OCT 3 - 1985

Stephen P. Mealey, Forest Supervisor
Shoshone National Forest
Post Office Box 2140
225 West Yellowstone Avenue
Cody, Wyoming 82414

Re: Shoshone National Forest
Proposed Plan and Draft
Environmental Impact Statement
(DEIS)

Dear Mr. Mealey:

In accordance with our responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act, the Region VIII Office of the Environmental Protection Agency has reviewed the referenced documents. The EPA appreciates the efforts invested in developing this long-range resource management program. We believe that it will provide a very positive influence on the achievement of environmental objectives which are shared by our respective agencies. Our enclosed detailed comments cover a substantial range of concerns and recommendations regarding water quality and quantity, riparian and wetland areas, aquatic life, and watershed resources.

The referenced documents have a commendable intent of improving the amount of surface water meeting water quality requirements. However, we felt that the Plan and DEIS should contain a better correlation of planned activities to state and EPA water quality standards regulations. For example, EPA's regulations require that the state's antidegradation policy should, at a minimum, provide for the maintenance and protection of existing instream water uses, and further degradation that would interfere with those uses is not allowable (40 CFR Part 131.12(a)(1)). Secondly, designated high quality waters have a special significance and are to be afforded protection "unless the State finds, after full satisfaction of the intergovernmental coordination and public participation provisions of the State's continuing planning process, that allowing lower water quality is necessary to accommodate important economic or social development in the area in which the waters are located", and "all cost-effective and reasonable best management practices for nonpoint source control" are required (Part 131.12(a)(2)). We recommend that existing water quality trends and standards be described in more depth as baseline data for consistency with management activities. We have expressed several concerns regarding water quality-related best management practices (BMPs) and the assessment of water quality impacts. 1

The EPA notes with considerable interest the inclusion of a watershed condition assessment in Plan Appendix G. We suggest that treatment priorities, planned improvements, and needs/priorities for watershed management planning be addressed more specifically. For example, are there any municipal water supply watersheds needing special consideration? 2

Forest Service Response

181-1 The Forest lacks data at levels sufficient to demonstrate the effects of past or planned activities on water quality with the specificity desired. In Chapter III of the Plan, a great deal of direction is provided with the intention of regulating all activities such that water quality standards, including nondegradation, would be met.

We direct your attention specifically to Forest Direction (blue pages) under Water Uses Management and Water Resource Improvement and Maintenance. Direction specific to water quality or stream channel protection is also provided in Range Management, Minerals Management and other activity categories that could potentially be harmful in terms of standards or water uses.

Since riparian area management is key to maintenance of water quality and aquatic ecosystems, direction is provided in the Plan to maintain the primacy of riparian areas (or other wetlands) when conflicts with other uses are apparent. See Riparian Area Management and Wilderness Area Management in the blue pages, and Management Area 9A in the yellow pages.

All such direction is geared to protect water quality at the level prescribed by the State, from Class I waters or fisheries of special significance to those designated Class III or lower. We view this direction as a set of recommended best management practices that hopefully will be validated through the State's continuing planning process, and coordination between agencies.

We also direct your attention to Chapter II of the Forest Plan, pages II-63 and 64 under Water Quality. The state of our water data base is discussed in this section. On page II-88 of the Plan, the need and justification for water data collection is elucidated, in precisely the terms found in your comment.

The Shoshone National Forest Water Resource Monitoring Plan is designed to correct the data deficiencies currently being experienced. This Plan incorporates two monitoring networks, one for the determination of water quality trends, and one to provide project specific data for management information and compliance with standards. The monitoring plan is specific to activity types and intensities, watershed sensitivity, sampling requirements (frequencies, parameters, durations, etc.), and reporting needs. We were unable to provide this document under the Forest Plan cover, but it is incorporated by reference. Implementation of the monitoring plan would, we feel, satisfy your concerns in addition to what we feel are our management needs (page II-83 in the Plan).

181-2 Time constraints prohibit a more specific treatment of the Watershed Improvement Needs Inventory at this time. We again direct you to the Plan, Chapter III, blue pages under Water Resource Improvement and Maintenance, General Direction 4 and associated standards and guidelines. It will be an ongoing task to inventory problem areas, set priorities, develop projects and obtain needed funding. Our Watershed Improvement Needs Handbook will provide a guide in this effort.

Comment 181

FPO-181 - O L G

2

We have identified apparent inconsistencies in the Forest Service direction for making recommendations on mineral lease applications. Inter-agency responsibilities for assuring lease stipulation compliance and for controlling potential water pollution sources, such as mine wastewater and mill tailings, should be more clearly established. We have requested more specific information on environmental impact assessment requirements related to mineral development. 3

We suggest revisions to the Monitoring and Evaluation chapter regarding requirements for: evaluating soil and water best management practice effectiveness; water quality monitoring; riparian areas and wetlands; and for fisheries habitat evaluations. 4

The Forest Plan and draft EIS represent a commendable level of public and inter-agency involvement. We suggest that the Plan describe the continuing coordination and consultation program in more detail generally, and specifically, as it relates to: water quality standards; the Clean Water Act Section 404 permit program; riparian and wetland area management; and to the project-specific planning process for such activities as logging, road construction, recreation, and mineral development. 5

Based on our concerns and the criteria EPA has established to rate adequacy of draft EISs, we have rated this draft EIS as Category EC-2 (environmental concerns-insufficient information). The EPA review has identified additional corrective measures, data, analysis, and discussion that should be included in the Forest Plan and final EIS. If further EPA assistance is needed, please feel free to contact Doug Lofstedt of my staff at FTS 564-1717.

Sincerely,

Dale Vodehnal

Dale Vodehnal, Chief
Environmental Assessment Branch

Enclosure

cc: James Torrence, Regional Forester
William Dickerson, A-104 (OFA)

Forest Service Response

181-3 Appendix K in the Forest Plan clearly describes the agency responsibilities under the mineral leasing process. Interagency responsibilities are detailed in the current cooperative agreement between BLM and Forest Service. This agreement is not duplicated in the Plan, but is incorporated by reference. Generally, monitoring of compliance with stipulations or operating standards is the responsibility of the Forest Service. In the event of noncompliance, a recommendation would be made to BLM which is the decision authority. See also responses to comments 181-18, 19 and 20.

181-4 It is not clear what revisions are being requested. Evaluation of soil and water best management pracatices and water quality are extensively addressed in the Shoshone Water Resource Monitoring Plan, which is incorporated by reference into the Forest Plan (see Water Resources in Table IV-1). A copy of this document was sent to your office at your request. Riparian areas and wetlands and fish habitat evaluations are included as monitoring items under the general heading of Wildlife and Fish. See also response to comment 181-26.

181-5 We ask you to recognize the myriad reporting and coordination tasks associated with the total Forest Management job. These are spelled out in the Forest Service Manual System, Memoranda of Understanding, Cooperative Agreements, and a number of other documents that are incorporated by reference into the Plan. Also, a great deal of this discussion is present in Chapter IV of the EIS under the Program Outputs section of each resource element.

Comment 181

FPD-181-0-L-G

EPA Comments on the Shoshone National Forest Proposed
Land and Rescurce Management Plan and Draft EIS

Water Quality/Quantity, Soils, Watershed

The EPA appreciates the preferred alternative intentions of achieving long term improvement in the amount of water meeting state water quality standards. It is unfortunate that water quality data is predominately at the "overview level" (Plan page II-61). We suggest that the Affected Environment chapter of the EIS address water quality trends more specifically in table or narrative format, based on existing data. Conditions and trends could then be correlated more clearly to management alternatives. The EIS should also list the beneficial uses assigned to the Forest's waters, again, to provide baseline information for consistency with activities to be done under the Plan. 6

Application of standards and guidelines are to "minimize the risk of cumulative effects on water" and best management practices (BMPs) are planned to "meet nonpoint source pollution standards" (DEIS page IV-46). We suggest that the nonpoint source (NPS) pollution standards be described and related to BMP design criteria. Secondly, the EIS should describe more directly the ability of the standards and guidelines/BMPs in protecting water quality standards and the NPS pollution standards. What changes will be made if planned BMPs are not adequate? Will other parameters besides sediment be used to assure BMP adequacy since there is no numerical criteria for sediment in Wyoming's water quality standards? The correlation, if any, of allowable sediment thresholds, determined under HYSED, to water quality standards and aquatic life goals should be addressed. We have problems with the projections of annually increasing sedimentation by over 25,000 tons (Plan page II-57). In what drainages are such increases to be concentrated? We believe that such increases need to be offset by other reductions in sedimentation. 7

The Plan and EIS should address the need to use management indicator species for water quality. We believe that there may need to be one or more water quality indicator species found lower in the food chain than trout (which is identified as a management indicator species), unless there is documentation showing that trout are the most sensitive to sediment impacts. A range of aquatic life taxa and functional groups may need to be considered if one or more individual species can not be determined at this time. Is use of the Forest Service's Biotic Condition Index planned? 8

The EPA notes with considerable interest the inclusion of a watershed condition assessment in Plan Appendix G. What are the priority watersheds for treatment? It is unclear whether the watershed assessment includes any stream segments identified as priorities in the latest Wyoming Section 305(b) report on state-wide water quality. The need for any comprehensive watershed management plans, by alternative, should be addressed. Such comprehensive planning could integrate various planned activities, set project-specific water quality requirements, and assess cumulative impacts before various development activities take place. If planned, where are they and when are they scheduled? If not, how are watershed-specific cumulative impacts to be determined? When is the final Forest-wide inventory of potential watershed projects to be completed? 9

Forest Service Response

181-6 Our water quality data base is insufficient to develop trends or discuss specific quality parameters in any meaningful way. Please see the first (181-1) response to your cover letter. The EIS discusses beneficial uses of water in Chapter III, under Water. Future efforts will consider potential impacts on these uses by analyzing quality levels necessary for each.

181-7 The Shoshone National Forest recognizes its responsibilities under nonpoint source standards promulgated from the Clean Water Act. It also recognizes its specific duties as a Water Quality Management Agency, duly appointed by the State of Wyoming. Accordingly, the memorandum of understanding between Wyoming DEQ and the Forest Service, which covers the points raised here, has been incorporated by reference into the Forest Plan. Using the authorities of this memo, the Clean Water Act, Forest Service Manual, etc, the Forest has developed a Water Resource Monitoring Plan (also incorporated by reference) that specifies the need and the means for investigating sediment and other water quality parameters resulting from a full range of management activities.

In the DEIS, page II-57, we project a sediment yield increase of 25,500 tons per year. This is compared to a projected natural sediment yield of 1,300,000 tons per year for an increase of less than two percent. We view the estimates of sediment and water yield as relative figures. Please refer to page IV-52 of the DEIS and note our statement near the top that "... figures should be regarded as estimates, significant only in relation to each other". As an indication of where our major sedimentation problems are, please refer to the Problem Assessment in Plan, Appendix G.

181-8 Your point is well taken. As we begin our implementation of the Water Resource Monitoring Plan, we will investigate the use of a more sensitive indicator species. Such a consideration is one likely benefit of the acid deposition monitoring presently being implemented on the Bridger-Teton and Shoshone National Forests.

181-9 See the response to comment 181-2. See also the Forest Plan Detail, Appendix J, (pink pages). The analysis area discussions include a listing of currently inventoried project sites. The Forest-wide inventory of potential project sites will be an ongoing task. Future environmental analyses of any kind will consider existing problem areas; these will be added to the inventory if not already present. We would estimate that a completion of the inventory, per our Watershed Improvement Needs Handbook, would require about 10 years.

We regret the confusing discussion of declining watershed condition. These are clarified in the final documents. We have presently inventoried about 900 acres of actual project work where watersheds are deemed to be in declining conditon. An additional 1,500 acres of project work are in stable, but unsatisfactory condition. The drainage areas affected by declining conditions amount to about 201,000 acres. This assumption was made necessary by the requirement to display "Water Meeting Quality Standards" as an output.

In regard to Table II-5, DEIS, page II-53, we made the assumption that watershed improvement measures implemented in the first decade (of which about 4 years remain) would not be realized in terms of "improved conditions" until the second decade. See the DEIS, page IV-67, Table IV-18, for clarification of this.

Comment 181

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2

The Plan on page II-72 and G-8 indicates a "backlog of 900 acres in declining watershed condition." Yet 201,000 acres are identified in declining condition on DEIS page IV-103. The existing conditions should be summarized more clearly. Furthermore, Table II-5 on DEIS page II-53 indicates no improvement in watershed conditions to be achieved in the first planning period by any alternative. We believe that the Plan and EIS need to address and target more specifically the watershed improvements by alternative during the first planning period that correlate to the Appendix G assessment. 9

The Plan indicates on page II-62 that "several watersheds exceed the sediment yield threshold, due primarily to existing roads." Which watersheds are they and what treatment is prescribed? We could not determine that the standards and guidelines for new and reconstructed roads address best management practices (BMPs) for water quality (Plan pages III-95 and 96). Effective and adequate BMPs, and water quality standards need to be consicered, along with the monitoring program, to minimize impacts and "determine for selected watersheds the level of acceptable change" (DEIS page IV-72). We could not determine from the discussion on DEIS pages IV-71 and 72 the comparative projected water quality impacts, by alternative, from roads. 10

The DEIS on page IV-25 suggests potential violations of the State's Class I water quality standards in wilderness areas because of grazing and recreational uses. However, it is unclear from the EIS whether adequate BMPs have been developed through the state and areawide water quality management planning process to protect the existing water uses and the level of water quality necessary to protect the existing uses. The Class I segments should be identified. 11

The assessment of impacts of various activities on water quality indicates probable temporary impacts. The EIS should disclose the degree of temporary impairment in terms of water quality standards. 12

We commend the general direction on Plan page III-68 for protecting instream flows. However, clarifications should be made on Plan page II-59 as to why there "is no process for obtaining legal water rights for most instream needs". 13

Additional EPA concerns regarding water quality monitoring and verification of BMP effectiveness are included in our comments on Forest Plan Implementation and Coordination.

VI-495

Forest Service Response

181-10 This is a "statement-out-of-context" problem. Please note that the quoted passage is prefaced by stating that a water model was used to determine sediment yield. Note also the next statement which indicates we have a lack of data to determine truly what the effects of timber management are. This lack of data required the use of assumptions as model inputs for sediment yield and threhold equations. HYSED model runs are retained in the Forest's working papers. The affected watershed are reflected in Plan, Appendix G, pages G-1 through G-3. See Management Area Prescription 9A in the Plan, yellow pages for direction (recommended BMP's) relating to road construction or reconstruction. Page IV-72 in the DEIS, paragraph two under Water provides this comparison through not quantitatively or in great detail.

181-11 Adequate BMP's have not been developed through the State and area-wide planning process. The state and EPA have been mute for some time regarding follow through in the 208 planning process. The Forest Service has developed management direction, standards and guidelines for protection of water quality. Regarding wilderness water quality, please see Chapter III of the Plan, Wilderness Area Management in the blue pages (DEIS, pages III-40 through III-46). This direction for wilderness riparian aquatic and wetland ecosystems is regarded as a set of recommended BMP's. We expect to coordinate with the state DEQ on a continuing basis to obtain agreement on and approval of all recommended BMP's.

181-12 We do not have sufficient data to deal quantitatively with impairment in relating to quantified standards. We urge you to review all discussions of water quality impacts by resource element in Chapter IV of the EIS. Please also review the discussions at the end of Chapter IV relating to short term versus long term impacts and irreversible and irretrievable commitment of resources.

181-13 The State has yet to enact any bill that authorizes instream flows for such purposes, or that recognizes instream flows as beneficial uses. Additional explanation is provided in the text, as requested.

Comment 181

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Riparian and Wetland Area Management

We appreciate the emphasis placed on riparian and wetland area management. One of our concerns deals with the effectiveness of intensive grazing management in achieving adequate riparian conditions. Goals are established, yet from the discussion under Water Quality on DEIS pages IV-110 and 111, there appears to be a question of whether adequate grazing and recreation controls will be administered in riparian/wetland areas. Consequently, we would like to see the ecological and streambank condition goals correlated more closely to the necessary level of management needed for implementation. We also suggest clarification (in Plan Chapter III) of standards and guidelines regarding proper stocking, distribution, and utilization rates, and rest periods to achieve the management goals. 14

General direction on Plan page III-67 prescribes "silvicultural . . . systems to achieve riparian area objectives." Yet from the discussion of requirements for Management Area 9A (riparian areas), we were unable to determine the standards for timber removal. We suggest that such standards be described. Additionally, the impacts of allowing removal of up to 20 percent of riparian ground cover (Plan page III-230) should be identified. What are the mitigation requirements for the wetland ecosystem impacts that could conceivably be associated with the ground cover disturbance?

Fisheries and Aquatic Habitat Management

The EPA recognizes the need to place adequate constraints on the various land use activities to protect the fishery resource. Yet the DEIS has a rather unclear analysis of potential impacts to fisheries and aquatic habitat. For example, the effects of roads "would occur in proportion to the road and trail construction reported in Tables II-5 and II-6." We view this as a starting point, but the analysis should go farther in describing relative differences by alternative and watershed. 15

We question the standard/guideline to provide fisheries habitat at only 40 percent or more of potential (Plan page III-47). This guidance appears to allow a significant deterioration of existing habitat in some cases, and an unacceptably low target for improvement. The EIS should address the ability of this level of habitat potential to provide viable, long term populations of aquatic vertebrates. We suggest standards under the general direction for providing habitat for "viable populations" of all native fish (Plan page III-225) that describe "viable", and that include stronger fishery/aquatic habitat direction derived from accepted methodology, and that are consistent with protection of water quality standards. The specific fisheries habitat or population evaluation method(s) to be used should be described and closely correlated to the monitoring program of Plan Chapter IV. At what level of deteriorated condition will improvement actions be instigated? 16

Forest Service Response

181-14 Your perception here is correct. The intent of the Plan is to protect riparian areas and wetlands and a good deal of direction is provided to that end. The amount of wetland areas on the Forest along with the number of potential impacts (both in kind and quantity) presents a staggering tasks to management. Definition of specific management goals, standards and guidelines in relation to different classes of riparian areas or wetlands is a task that has been identified and begun.

Until standards (such as you suggest) for range or timber management have been developed for riparian areas, the overriding guide is protection. The Forest Service Manual (2526) provides for multiple use management of riparians, but at the same time stipulates "preferential consideration to riparian area dependent resources over other resources in cases of unresolvable conflict". Other manual direction pursuant to range, timber and facilities provides additional guidelines. Management direction in Plan, Chapter III will be revised to amplify on the above (Riparian Area Management in blue pages and prescription 9A in the yellow pages).

181-15 We urge your consideration of the scope of this document and the amount of material presently in it.

Any future action such as road construction must be preceded by environmental analysis. Such analysis includes consideration of the effects described in the Plan EIS; if effects are insufficiently displayed for a given project, as is the case here, the detailed analysis must be completed doucmented, and make available for public comment (if significant effects on wetlands/floodplains are involved). Note that aquatic habitat has been treated synonymously with riparian areas.

181-16 The identified standard represent minimum levels for any vertebrate species; actual goals for most species will be significantly higher including fish. See the General Direction in Chapter III of the Proposed Plan: GD 5 on page III-47; and GD 2,3,4,5,7 and 8 on pages III-225 and 226. This direction remains the same in the final Plan.

Comment 181

Forest Service Response

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A dollar amount is used as the unit of measure of aquatic habitat improvement in Table II-5 (DEIS page 52). The DEIS should include the actual improvements in stream miles, etc. which correlate to targeted expenditures. How much is to be accomplished versus needs? **17**

181-17 The dollar estimates were used as a preliminary inventory of stream improvement needs. Such a detailed inventory as requested will be accomplished in the initial phases of Plan implementation.

Minerals Management

The Plan presents considerable confusion in addressing Forest Service policies on handling oil and gas leasing requests. On Appendix page K-1, Forest Service general direction would "recommend leasing on all lease requests for lands legally available for oil and gas leasing." Yet general direction in Chapter III contains criteria for determining whether specific oil and gas lease applications should be approved (one example is on page III-76). We agree with the approach of having evaluation criteria for individual applications until such time as the existing resource conditions and environmental constraints/thresholds are available for making the broad leasing decisions. We suggest that the potential to impair water quality standards be an additional lease evaluation criterion. One of the criteria appears to allow leasing on slopes up to 60 percent on "unclassified" lands. The Plan and EIS should assure adequate site control planning and impact analysis to prevent erosion and protect water quality. The Forest Service role in Application for Permit to Drill (APD) processing and the environmental grounds for APD denial should be addressed (Plan Chapter III and DEIS page IV-60). We commend the inclusion of possible operating plan conditions in Appendix K. **18**

181-18 General direction for minerals management will be amended to include criteria for water quality protection, as you suggest. The blue pages direction is viewed as a regionalized standard. From the legal standpoint, we are told such items as lease denial are not so simple and may be illegal. The Forest Management Team decided, therefore, to protect surface resources - using the criteria included in blue pages direction - by applying "no surface occupancy" stipulations. This avoids the question of legality in recommending "no lease", and protects the surface resources where appropriate.

Appendix K represents our interpretation of the blue pages direction for minerals, constructed as an aid in making lease recommendations.

The respective roles of the Forest Service and Bureau of Land Management for assuring compliance with the environmental stipulations applied to leases, APDs, and the operating plans need to be described more clearly under Management Direction. Furthermore, "mining activities would produce mine wastewater, mill tailings, waste liquids, and soil stockpiles" (DEIS page IV-60). The role and responsibilities of the Forest Service and other agencies in preventing these potential pollution sources from impairing water quality standards needs to be more clearly established in the Plan. **19**

181-19 All memoranda of understanding and cooperative agreements with other agencies are incorporated by reference in the Forest Plan, as is Forest Service Manual direction. Also incorporated by reference is the Wyoming Oil and Hazardous Substances Pollution Contingency Plan. Responsibilities of the Forest Service and other agencies are thereby clearly established in the Plan.

Any development plan for oil, gas, and mining, should address and protect any potential ground-water resources. In oil and gas development, wells should have surface casing set through the fresh water aquifers, at least 50 feet into the underlying confining formation, secured with cement to the surface. All pits should be dug deep enough to accomodate all necessary drilling fluids. In the mineral development plans of the Forest, precautions should be taken to protect ground-water resources. For example, if the mining operation is going to use heap leaching technology, then adequate lining and berms should be incorporated into the program, as well as an adequate disposal method for "spent ore" to insure ground-water protection. **20**

181-20 The Forest Service is committed to imposing operating standards that reflect the latest and best technology for preventing groundwater pollution. We expect to coordinate in this regard with Wyoming DEQ and the Wyoming Oil and Gas Conservation Commission.

Comment 181

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5

Grazing

We generally agree with the range management objectives in the Plan and DEIS. We would, however, like to see the direction of achieving "satisfactory" range conditions described more specifically in terms of range ecological condition and values of the rangeland plant community (in addition to forage production) on Plan page III-55 and in the EIS. It appears to us that at least good ecological condition should be considered. Plans to get existing fair ecological condition rangelands on an improving trend should be clarified. Additionally, the DEIS states on page IV-34 that the Federal Land Policy and Management Act of 1976 (FLPMA) directs that "All rangeland in less than satisfactory condition" be improved. The specific FLPMA cite should be stated. **21**

The Forest Service intent under the preferred alternative would be to increase the "risk of watershed condition decline and cumulative adverse effects" (DEIS page IV-37). Yet on DEIS page IV-38, it is stated that standards and guidelines will "minimize the risk of adverse impacts from grazing." We recommend a clearer, more specific discussion of environmentally acceptable range management objectives for water quality, and watershed and associated values under the preferred alternative. We feel that with proper management, the risk of watershed deterioration should not increase. **22**

The inclusion of range management needs in Plan Appendix J is commendable. We suggest that the Plan list the allotments in priority order for management planning. The environmental and other factors for ranking the allotments should be described. We believe that factors such as ecological condition, erosion rates, water quality, and riparian/streambank condition should be included. What is the time schedule for allotment planning? **23**

Apparently, from Table II-6 on DEIS page II-56, 622 acres of "sage management" would be done annually. We suggest that the standards and guidelines for such activities include environmentally acceptable methods of impact analysis and implementation. What types of herbicide are planned? Multiple resource management objectives of sage treatment should be clarified (in addition to increasing wildlife and livestock forage). **24**

Forest Plan Implementation and Coordination

There may be instances where early consultation with other agencies and/or representation on inter-disciplinary field reviews will be needed. Such activities may include: road and timber sale projects, fishery improvement projects, oil and gas lease applications, Applications for Permit to Drill, locatable mineral operating plans, channelization, or other projects. We suggest that the Plan include this type of provision. Are there **25**

Forest Service Response

181-21 Satisfactory range condition is defined as fair or better ecological condition and if in fair condition having any upward trend. The citing is 36 CFR 19.20 (a).

181-22 We feel that the discussion is adequate as written. Risks are inherent in forest management; the greater or more intense the management, the greater is the risk involved. With greater risk, there is greater need for and reliance upon monitoring and administration to ensure that practices are being carried out to the appropriate standard.

181-23 All allotment management plans must be completed in the first decade. Implementation schedules will prioritize the allotments based on the factors suggested plus areas with known range administration problems and those planned for possible reductions or eliminations.

181-24 Virtually all of the sage treatement will be by prescribed burning. Site-specific projects will be analyzed in accordance with NEPA and in cooperation with the Wyoming Game and Fish Department. Appendix J of the Forest Plan describes acreages for sage treatment for either cattle or wildlife and burning plans must meet vegetation diversity standards.

181-25 Consultation with other agencies is instituted as needed for all projects and programs.

FPD-181-0-L-G

periodic inter-agency meetings (such as under the MOU with the Wyoming Department of Environmental Quality (Plan page III-3)) to discuss upcoming projects on Forest Service lands and to evaluate monitoring results? **25**

We commend the Forest for including it's extensive water quality monitoring plan in the Forest Plan. We have several concerns that we would like to have addressed, because we feel that an effective environmental monitoring program is a major output of the forest planning process. The ability of the monitoring program in assessing cumulative impacts and their sources should be addressed. Will biological monitoring and water quality indicator species be utilized? The utility of using eco-regions/reference streams to determine relative stream conditions should be addressed. Given the recent lack of monitoring funds, the Plan should address contingency plans for dealing with inadequate funding. For example, how will scheduling of planned projects (roads, mineral development, etc.) be affected if corrolary monitoring can not be funded? The feedback mechanism assuring responsiveness of resource management decisions to monitoring should be discussed in more detail. We also suggest that planned use of Knutsen-Vandenburg (K-V) and any other potential funding sources for water quality and other environmental monitoring be discussed in the Plan. How are the state and federal monitoring programs coordinated? **26**

181-26 It is not possible to include the details of monitoring requested. If one resource, e.g. water, had such details, we would have to include equal detail for other resources. This is the reason for the statement in Plan, Chapter IV that mentions details of monitoring being found in materials incorporated by reference. These materials are available upon request. See response to comment 97-2 and 44-55.

The Plan on page II-84 calls for "development and verification of best management practices" regarding water quality. The process of developing BMPs should be briefly discussed. We recommend that the Monitoring and Evaluation chapter include requirements (field review, quantities, frequency, etc.) for evaluating the effectiveness of installed soil and water BMPs and of riparian management standards and guidelines. **27**

181-27 See response to comment 181-4.

We appreciate the Forest's plans for cooperating with the Corps of Engineers (COE) "in obtaining the information necessary to administer the "404" permit process" (DEIS page IV-53). We recommend that the discussion of the program be expanded to address coordination with the COE and other relevant agencies in identifying projects needing an individual permit and in developing mutually agreeable mitigation requirements for individual projects. The COE recently revised it's regulations for the 404 dredge and fill permit program requiring that the COE be notified in advance of activities that formerly were allowed under the nationwide 404 permit without pre-notification. The pre-notification process will be used to determine whether an individual 404 permit is needed. The Shoshone National Forest process for pre-notification should be described. **28**

181-28 The pre-notification process we have used for projects that fall within our nation-wide permit has been a cover letter with attached details of the project. We will continue this approach unless COE specifies another process.

The Plan calls for only a five percent annual sample of riparian conditions (page IV-5). We question whether such limited monitoring is adequate, particularly because of heavy reliance on intensive grazing management to protect/improve riparian conditions. What are the management indicator species for riparian areas and wetlands? **29**

181-29 As shown on pages III-38 and III-39 of EIS management indicator species for riparian areas and wetlands are beaver, moose, and game trout.

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7

We suggest that the methodology to be used for evaluating fisheries habitat conditions and trends (or fishery population dynamics) should be discussed in Plan Chapter IV. A methodology such as Binns' (1982) Habitat Quality Index or USFWS's PHABSIM program (Milhous et al. 1981) would provide an estimate of fisheries habitat. It is unclear what "annual" measurement frequency means for the management indicator species monitoring item on Plan page IV-5. Sampling schedules need to correspond with the appropriate portion of the life cycles of the population being monitored.

30

Forest Service Response

181-30 The Wyoming Game and Fish Department is responsible for management of fish population. A Forest Service Fisheries Biologist will cooperate with the State in monitoring fish populations and aquatic habitat trends. Annual measurement frequency means the items identified in the data source columns will be updated at least on a once-a-year basis.

Comment 182

Forest Service Response

Postmarked 10/3/85

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Proj. No. Orig Type Affil

Greater Yellowstone Coalition

October 3, 1985

Mr. Stephen P. Mealey
Forest Supervisor
Shoshone National Forest
P.O. Box 2140
Cody, WY 82414

Dear Steve,

Thank you for this opportunity to comment on the Shoshone National Forest Draft Forest Plan. The Greater Yellowstone Coalition appreciates the efforts of you and your staff in planning the future management direction of the Forest. Enclosed, find our comments on the Draft Plan.

Thank you for your comment.

VI-501

Sincerely,

Bob Anderson

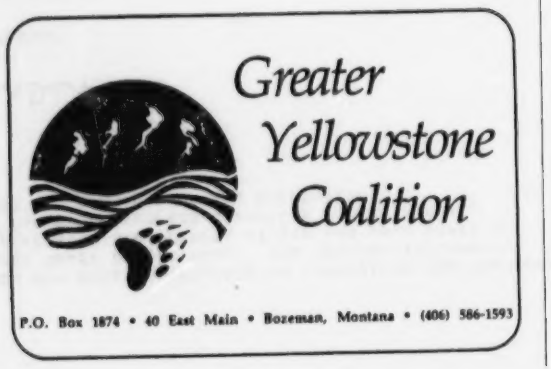
Bob Anderson
Executive Director

40 East Main Street • P.O. Box 1874 • Bozeman, Montana 59771 • (406) 586-1593

Comment 182

Forest Service Response

FPD-182-D-L-C
Proj. No. Orig Type Appl



Comment 182

Forest Service Response

FPD-182-0-L-G
Proj. No. Orig Type Affil

VI-503

COMMENTS

of the

GREATER YELLOWSTONE COALITION

on the

PROPOSED SHOSHONE NATIONAL FOREST PLAN

Contact person:
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Greater Yellowstone Coalition
P.O. Box 1874
Bozeman, MT 59715
(406) 586-1593

October 3, 1985

Comment 182

COMMENTS
of the
Greater Yellowstone Coalition
on the
Draft Shoshone National Forest Plan

October 3, 1985

The Greater Yellowstone Coalition

The Greater Yellowstone Coalition is an alliance of 43 regional and national conservation organizations. We are committed to the protection and preservation of a healthy Greater Yellowstone ecosystem.

The Greater Yellowstone Ecosystem

The majority of the Shoshone National Forest lies within the Greater Yellowstone ecosystem, the largest, essentially intact ecosystem in the world's temperate zones. Greater Yellowstone contains the world's first national park and boasts unsurpassed wildlife, fisheries, scenery, geothermal wonders, and recreational opportunities.

The Shoshone National Forest comprises the northeast side of the Greater Yellowstone ecosystem. These lands contain critical habitat for plants and wildlife of Greater Yellowstone and offer some of the best recreational opportunities in the ecosystem. While the Draft Shoshone National Forest Plan acknowledges the ecosystem's importance, no mention of management of the ecosystem, or the Shoshone National Forest's role in that management, is made. The final Shoshone National Forest Plan should take into account the importance of the Forest's interdependence with the Greater Yellowstone ecosystem.

Cumulative Effects Management

Greater Yellowstone is under siege. Past and ongoing activities have altered the ecosystem to the point that further development could irreversibly compromise its integrity. Now, the ecosystem is on the threshold of a new wave of proposed projects (see Threats to Greater Yellowstone 1984 by the Greater Yellowstone Coalition). Any one of these developments could be tolerated, its effects mitigated. But, taken together, even in small numbers, these projects seriously threaten the ecosystem. Decisions on each of these developments should take them all into account.

The development, adoption, and implementation of the Shoshone National Forest Plan is one of the most important decisions faced by the Greater Yellowstone ecosystem. The Plan

Forest Service Response

Thank you for your comment.

should assess the cumulative effects of ongoing and proposed activities on the Custer National Forest as well as adjoining forest and park lands.

FORPLAN

The Shoshone National Forest has many resources that can be enjoyed by the people of the nation. Most of these resources can be exploited on sustained basis and can enrich the economies of the region and the nation forever.

Unfortunately, the use of some of these resources conflicts with the use of others. For example, the building of roads for timber harvest in critical grizzly bear habitat increases the chances for human-grizzly encounters and disrupts the bears' use of the area. So, many choices must be made.

The Shoshone National Forest Plan, through the the use of FORPLAN, has attempted to display the tradeoffs among the uses of forest resources. However, FORPLAN leads to erroneous conclusions because of incorrect data. The attached analysis of the Draft Plan (CHEC, 1985) provides a specific critique of many aspects of the Plan.

The range of alternatives in the Draft Plan FORPLAN model was too narrow. If Alternative E, the reduced budget alternative, is not considered, the alternatives offer a narrow range of timber harvest volume, recreation, and grazing (CHEC, pp. 12-13; DEIS, Table II-6, pp. II-55-58). The reduced budget alternative yields small levels of outputs, including recreation. An alternative which produces high levels of recreation and low levels of commodity outputs should be added to the range of alternatives. 2

FORPLAN also has biases due to incorrect assumptions about the relationships among timber management and recreation, wildlife, and water (CHEC, pp. 4-7). These assumptions are discussed in detail in the following section.

Timber

The timber yield tables in the Draft Plan overestimate the productivity of future timber stands (CHEC, pp. 2-3). Therefore, projections of sustained yield are too high. The Final Plan should correct these errors in the timber yield tables. 3

Timber values in the Plan range from about $39 per thousand board feet to $59 per thousand board feet (CHEC, p. 7). CHEC's analysis shows these values may be overestimated by as much as 4

182-2 See response to comment 44-1.

182-3 R2GROW is a model used to estimate timber growth and response to management activities. The base parameters for this model come from actual stand data from the Forest. Because of the silvicultural prescriptions modeled for planning included treatments such as thinning, a comparison of a single factor across the full range of yield tables can result in an inaccurate conclusion regarding such estimates of growth and yield. The growth and yield projections from both R2GROW and RMYIELD were checked against actual stand data for accuracy before they were used as inputs to planning. Discrepencies were resolved at that point in time as shown by the many minor differences between results of these models and the yield file coefficients used in analysis.

Verifying the accuracy of all estimates of costs, output levels and effects for all goods and services included in planning is a major feature in monitoring and evaluation of Plan implementation. When inaccuracies in such estimates effect the long term mix of goods and services that will be produced, the Forest is obligated to amend or revise the Plan. This is true of estimates of growth and yield estimates for timber as it is for all other costs, outputs, effects and benefits.

182-4 See response to comment 44-44.

Comment 182

50-60% (pp. 7-9). At lower timber values, many Shoshone sales would lose money. The Final Plan should correct the errors in timber values pointed out by CHEC and make the necessary revisions in the Forest's timber and road construction programs. 4

The DEIS states that timber sales on the Shoshone provide benefits other than timber receipts (p. III-45). However, those benefits usually have little or no value. 5

The DEIS cites increased water yield as a side benefit of timber harvest (p. III-45). While increased timber harvest will probably yield more water on the Forest, it is doubtful the increase has any value. For additional water to be of value, storage capacity must exist to deliver the water to users at the time of the year when water is scarce. Storage facilities do not exist for many drainages on the Forest and those that do are often filled to capacity (CHEC, p. 11). Thus, the costs of building additional storage and delivery facilities must be deducted from the $45.50 per acre-foot value assumed for water. Once these costs are deducted, the net value of additional water produced on the Forest is likely to be negative. 6

The DEIS also mentions benefits to wildlife as justification for timber sales (p. III-45). The Draft Plan assumes timber harvest will increase wildlife habitat diversity and proposes timber harvest to optimize habitat, particularly for elk (CHEC pp. 4-5). While timber harvest may benefit wildlife in areas where forage is the limiting wildlife factor, the Shoshone is naturally open and supplies ample forage (CHEC p. 5). Cover and winter range are usually the limiting factors for wildlife populations on the Shoshone (DEIS, p. II-49, IV-48). Since timber harvest often decreases cover (DEIS, IV-48), timber harvest seldom benefits wildlife unless it increases winter range. 7

THE DEIS also assumes increased motorized recreation opportunities are a side benefit of timber harvest (p. III-45). However, the Shoshone National Forest's capacity for motorized recreation far exceeds demand. (CHEC, pp. 10-11). Therefore, increasing the supply of motorized recreation on the Forest has no value. 8

The DEIS also cites better fire protection as a benefit of timber harvest (p. 73-74). However, roads greatly increase the risk of fires because of increased debris and human use. Only if it is shown that the benefit of easing fire suppression problems clearly exceeds the cost of increased fire risk should fire protection be used as a justification for below-cost timber sales. 9

Insect and disease control is a potential benefit from timber management (DEIS, p III-45). The major insect problem on the Shoshone National Forest is the mountain pine bark beetle. Commandra blister rust and dwarf mistletoe are the main disease problems. The Draft Plan calls for silvicultural activities, 10

Forest Service Response

182-5 The planning process used did not assume that increased roading automatically benefited recreation. The relation of roads (existing and new) to recreation varies depending on the recreation opptunities being provided. Briefly, there are no roads allowed in Primitive areas, no open roads allowed in Semiprimitive Nonmotorized areas, only a certain density of roads allowed in Semiprimitive Motorized, and few restrictions on roads in Roaded Natural and Rural areas. Refer to EIS Chapter VII-Glossary under Recreation Opportunity Spectrum for for definitions. Prescriptions for individual areas were developed based on providing a targeted mix of recreation opportunities in that area. In or near that portion of an area targeted for primitive recreation, roads do not benefit, and in fact are a detriment, to recreation. In that portion of an area targeted for semiprimitive nonmotorized recreation roads will not benefit and may or may not be a detriment to recreation depending on location and road management. In areas targeted for motorized recreation, additional roads can benefit recreation. See response to comments 44-46 and 44-43.

182-6 As part of analysis, a "minimum level" benchmark was made to estimate the value of goods and services that would be produced if there was no management of the Forest. This included estimating the water produced naturally on the Forest and the economic value of the water. The ability to increase this water volume through management activities is insignificant. Further, the net economic values from production of all goods and services under minimum level management was subtracted from the net economic values presented for all alternatives. This means that water production played no role in selection of management strategies in alternatives and timber harvest was not justified in terms of water production. Both of these points are discussed in Chapter IV and Appendix B of both the DEIS and EIS.

182-7 See response to comments 44-43 and 168-2.

182-8 See response to comment 44-46.

182-9 These comments have some merit applied on a very broad scale. However, they do not accurately reflect the situation on the Shoshone National Forest where large fires are common in wilderness and roadless areas and much less common in roaded areas. Fire records since 1965 clearly show the importance of roads in prompt fire suppression in suitable timber land in the Shoshone.

182-10 The Forest Plan utilizes the best currently available scientific information regarding silvicultural practices. This information contributed to the establishment of the silvicultural standards and practices listed in the Forest Plan. As additional knowledge is gained, practices can be improved.

With vast, continuous areas of heavy timber (those most susceptible to insect and disease attack), it is very difficult and expensive to attempt to control burn acres of 40 acres or less. In addition, lodgepole pine stands with nonserotinous cones, are slow to regenerate naturally following fire.

such as clearcutting, slash disposal, thinning, and partial cutting, to control these problems. Benefits and costs of any method should be considered before the practice is implemented.

Mistletoe and commandra blister rust do not attack trees of a particular age, so conversion of overmature timber to younger stands will not provide protection against these diseases. The cost of both diseases is diminished stand growth, not tree mortality (CHEC, p. 15). However, trees in a below-cost timber sale have no value, so efforts to combat the diseases in those areas are wasted. Additionally, timber harvest may actually enhance the spread of commandra blister rust by providing additional openings, which provide excellent habitat for toad flax, the host for commandra blister rust.

10

In many situations, bark beetles attack only weaker trees in a stand, thus providing a natural thinning operation at no cost. Commercial thinning almost always costs the Forest more than the value derived from the operation. Therefore, these selective bark beetle attacks should be welcomed by the Forest.

Bark beetle epidemics, however, kill nearly every tree in a stand. If the trees are in a below-cost stand, they have no net value and there is no reason to treat the stand. If the epidemic creates an unacceptable fire risk, controlled burns of high risk stands should be considered as a means to treat the insects. The benefits and costs of controlled burns should be weighed against the benefits and costs of other methods before a treatment technique is selected.

182-11 See response to comments 44-51 and 44-46.

In addition to those mentioned above, the United States Forest Service has identified some additional potential side benefits from timber harvest (USFS white paper on sales-below-costs, July, 1984). These include access to future timber sales and community stability.

11

New roads for access to future timber sales will reduce the cost of future timber sales. However, figures from the Shoshone FORPLAN indicate timber costs will continue to exceed revenues after the road network is completed (CHEC, p. 14). Therefore, there is no benefit to building roads for access to future timber sales.

182-12 No where in the documents was there a discussion of justifying cutting timber at a loss by the number of jobs created in local economies. Timber harvest levels in the Plan (and all alternatives) were based on biological and economic efficiency considerations. All proposed timber harvests are projected to "pay for themselves" given the assumption that stumpage prices and their trends over the last 2 to 3 years continue (except for a down turn in the early 1980s these prices and trends have been fairly consistent for the last 10 to 12 years). As stated in response to comment 44-54, the number of jobs estimated by IMPLAN per MMBF is probably inaccurate given the difference between technology assumed as a national norm in the model, and the more labor intensive technology used locally.

Perhaps the most frequently cited, and most politically charged, reason for continuing to cut timber at a loss is to maintain community stability. The Shoshone National Forest provides jobs to the local community through its timber program. Timber sales provide 8.2 jobs per million board feet (CHEC, p. 16). For a annual harvest of 11.1 million board feet, this equates to 54 jobs, a small fraction of the 16,000 jobs in the local area (DEIS, Table B-13, p. B-113). In comparison, recreation provides many more local jobs. Outfitting alone is responsible for over 500 local, mostly seasonal, jobs (CHEC, p. 16).

12

As many communities are finding out, a stable economy requires a diversity of industries. In this way, economies are much like ecosystems where diversity often translates into hightened stability. Therefore, a mix of outputs in terms of recreation types, timber and grazing of domestic livestock will tend to yield a more stable economy than reliance on just one of these. Given that, the question is what mix is most appropriate. To help address this question, the biological capability, economic impacts, social impacts and economic efficiency of various mixes were investigated, displayed as part of benchmarks and alternatives, and the final mix chosen in the preferred alternative. See also response to comment 44-54.

Comment 182

Cutting timber does little to contribute to a stable local economy. However, timber harvest can destabilize the significant portion of the local economy that depends on wildlife, recreation, and scenery resources. The Shoshone National Forest should not cite community stability as a benefit of timber harvest. Instead, the Shoshone National Forest should enhance community stability by reducing its timber harvest, thus reducing the conflicts with non-commodity forest resources. 12

Because timber sales on the Shoshone National Forest rarely have side benefits, below-cost timber sales on the Shoshone National Forest can seldom be justified. No below-cost timber sales should be sold on the Forest unless benefits can be shown to exceed costs. It is the burden of the Shoshone National Forest to provide an analysis of benefits and costs of the timber program in general and of each sale. Such an analysis is absent from the Shoshone National Forest Plan. 13

Roads

Roads on the Shoshone National Forest are primarily built and maintained for timber harvest. Roads are the most significant cost in the timber management programs and, most of the time, are heavily subsidized by the taxpayers of the United States.

The proposed Plan calls for construction of an annual average of 13.3 miles of new roads in the next fifty years (Plan, p. II-90). 665 miles of new roads will be built, increasing the total number of miles of maintained roads on the Forest from 1,536 to 1,661 by the year 2035. 15

New roads on the Forest provide some benefits to the public. These include increased access to Forest lands, increased motorized recreation capacity, easier access to timber and minerals, and better control of fire, insects, and diseased timber. However, in many instances on the Shoshone Forest, these benefits are outweighed by the costs of road construction. 16

As we have shown, access to below-cost timber sales often provides no net benefit. Since there is an excess supply of motorized recreation on the Forest, new roads for that purpose provide no benefit (CHEC, pp. 10-11). Roads often increase, rather than decrease, fire danger on the Forest (DEIS, pp. 73-74; CHEC, pp. 14-15) and, many times, insects and disease can be controlled with more cost-effective means than building a road to the infested areas and cutting the timber (CHEC, pp. 15-16). Roads built for access to minerals often cost more (including environmental degradation) than the value of the minerals. 17

In contrast, building roads always has serious monetary and environmental costs (DEIS, pp. IV-70-74). Roads increase the sediment in Forest streams, require increased budgets to build, close, reclaim, or monitor, and increase disturbance of wildlife.

Forest Service Response

182-13 It is erroneous to state that timber sales on the Forest rarely have side benefits. Such sales using the standards and guidelines identified in the Plan can have significant localized benefits on such resources as wildlife habitat, vegetative diversity, integrated pest control, protection from catastrophic fires, and water production. Given the very limited amount of land suited for timber management on the Forest (about 3.5 %), it is fair to say that forestwide such effects may be insignificant, but not within the local areas harvested.

As discussed in Chapter IV of the EIS and Appendices B and C to the plan, analysis showed that the timber programs of each alternative more than paid for themselves when looking only at costs associated with that program and the revenues received (i.e. not including the derived benefits to other resources). In other words, there are no below cost sales to be justified by these other benefits. That is not to say that those other benefits are not important and should not be reported; rather, they are not necessary to justify the harvest levels proposed in the Plan.

182-15 In response to numerous concerns, the number of acres managed for timber harvest and the resultant amount of roads has been reduced in the final Plan. In the next fifty years, the Plan projects only eighty miles of new road which will be open to the public. There is projected 120 miles of existing road which will be improved and remain open to the public. An additional 150 miles of new road, and 255 miles of reconstructed existing roads are projected to be closed to the public within the 50 year period. Road construction and reconstruction figures have been corrected. See also response to comments 182-5, 33-9, 80-5, and 44-46.

The Forest Plan will guide management over the next 10 to 15 years and will be revised every 15 years or sooner in response to major changes in information or needs of the American public. Projections over 50 years are provided to portray long term consequences only.

182-16 There are no roads proposed in the Plan in which road costs exceed road benefits.

182-17 See response to comments 44-46, and 44-52.

Comment 182

Roads into occupied grizzly habitat increase the chance of grizzly-human encounters, which, in turn, increases the risk of bear mortalities. Roads built into previously roadless areas destroy the opportunity for primitive recreation. In sum, the costs and adverse impacts of roads are large and, many times, outweigh the benefits.

The DEIS considers the environmental effects from construction, maintenance, and existence, but not the use, of roads on the Forest (p. IV-70). The use of roads has a significant impact on other resources on the Forest. The failure to consider these impacts seriously flaws the Draft EIS. These impacts should be considered in the Final Plan. **18**

The roadless lands on the Shoshone National Forest provide a precious resource to the public. These lands are pivotal for wildlife and offer much of the potential for primitive recreation. The value of these lands will continue to increase as roadless lands dwindle elsewhere.

Many of the roads proposed in the Plan would be built into roadless areas. These roads would result in particularly large costs since they will destroy the pristine nature of the area forever. Wildlife populations will be displaced, sediment in the area's streams will increase, and the primitive recreation potential will be destroyed. **19**

Management Prescription 3B should not allow roads (Plan, p. III-148). **21**

Beyond a general revamping of the timber and road-building programs outlined in the Plan, the roadless portions of the following areas should be managed under Management Direction 3B (Primitive recreation) because of their high wildlife, recreation, or scenic values: Table Mountain, Five Mile Creek, Six Mile Creek, the Lodgepole drainage, Little Sunlight Creek, Russell Creek, Dead Indian Gulch, Dick Creek, Ghost Creek, Timber Creek, Little Popo Agie Creek, Wood River, Trout Creek, Dunn Creek, Logan Mountain, Jules Bowl to Bonneville Pass, northwest of Brooks Lake, the North and South forks of the Shoshone River, Wolf Creek, Brent Creek to Trail Creek, Deep Lake, Dunoir Valley, Sawmill Creek, North of Sinks Canyon, lands surrounding Worthen Meadows, and Fiddlers Lake to Christina Lake. Any additional areas suggested for roadless management by the Wyoming Department of Game and Fish should be incorporated into the Final Plan. **22**

The road construction program should be reevaluated by the Forest, taking into consideration the points mentioned in these comments. The number and miles of new roads proposed by the Plan should be reduced, especially in critical wildlife habitat and roadless areas. **23**

Road closures are of utmost importance, once roads have been constructed. Closures must be done in a way that will prevent

Forest Service Response

182-18 Effects of road use were indeed considered in the design of analysis area prescriptions and in the prediction of outputs and effects. Management of road use has a large influence on recreation opportunities and on wildlife. The statement on page IV-70 of the DEIS has been deleted.

182-19 Roading into roadless areas does indeed represent more or less irreversible loss of the opportunity to manage for pristine conditions. This opportunity cost is one that was weighed by society itself in passage of the Wyoming Wilderness Act of 1984. That bill, in effect, judged the opportunity cost of lost pristine in the nondesignated areas to be less than the opportunities gained by leaving the areas undesignated. See also response to commewnt 44-46.

Wildlife and water quality are among the resources considered in designing projects in all areas. Standards for protection of these and other resources are included in the Plan.

182-21 The general direction statement in question says that existing roads will be converted to trails or obliterated. There are no roads allowed in 3B areas. See also response to 44-46.

182-22 See response to comment 42-1.

182-23 See response to comment 182-15

violations and must be strictly enforced in order to be effective. We urge the Forest to take an aggressive posture toward enforcement of all road closures. 23

Water

Water quality is currently good on the Forest. The Plan predicts the proposed alternative will have a positive effect on water quality, but admits that meeting those water quality goals depends on a number of assumptions which relate to funding levels or adherence to restrictions by Forest users (DEIS, pp. IV-50-51). Past experience has shown that neither of those types of assumptions are reliable. Because of the uncertainty about the level of oil and gas development and the Plan's proposed increase in road construction, water quality could suffer.

We urge the Forest to develop and fund a comprehensive water quality monitoring program. The DEIS admits that funding levels will likely preclude some planned mitigation, water quality improvement, and monitoring projects (p. IV-51). Therefore, the monitoring program should include feedback mechanisms to reduce, modify, or eliminate development if water quality declines or if adequate funding for monitoring or mitigation is not realized. 25

Data on current water quality of Forest streams are lacking (Summary, p. 44). These data are essential in order to assess the affects future management has on Forest water. We urge the Forest to give a high priority to collecting baseline water quality data.

As was pointed out in the "Timber" section of these comments, the value of increasing water yield on the Forest has been overestimated in the Draft Plan. This error should be corrected in the Final Plan. 26

Grizzly Bears

The grizzly bear is an important component of the Greater Yellowstone ecosystem and the Shoshone National Forest, as a predator, as a symbol of the wildness of the area, and as an indicator of the health of the ecosystem. Perhaps in no other way is the interdependence between the Shoshone National Forest and the Greater Yellowstone ecosystem as a whole dramatized more than by grizzly behavior and ecology.

The Draft Plan takes a very optimistic attitude about the ability of the grizzly bear to accommodate human pressure in the form of increased timber harvest, livestock grazing, and road construction. This attitude contradicts research which points to a severely stressed population of bears which cannot stand such 27

182-25 The Forest has developed a comprehensive water monitoring plan that is incorporated by reference. water monitoring costs have been included in each FORPLAN prescription, according to the criteria set up in the monitoring plan. Additional forest-wide costs were included for the maintenacne of a long term monitoring program involving a number of baseline sites. Full funding of this program depends upon the budget accorded to the Forest. We intend to implement monitoring concurrently with management activities that require it.

182-26 See response to comment 182-6.

182-27 It is recognized that disturbance activities such as timber sales can displace grizzly bears and potentially increase the risk of bear mortalities. Mitigation measures such as provisions for adjacent security areas and stringent controls on timing and administration of activities will be incorporated as necessary in timber sales. As indicated, logging can improve the quality and quantity of bear foods.

Comment 182

increased encroachment on its already beseiged habitat (Knight and Eberhardt, 1985. Population dynamics of Yellowstone grizzly bears. Ecology. 66(2):323). For this reason, we are extremely concerned with some of the proposals in the Shoshone Forest Plan. 27

Attached to these comments are our suggested changes in the Greater Yellowstone Grizzly Bear Management Guidelines. We urge the Forest to adopt our suggested changes and make any necessary revisions in management decisions to incorporate the changes into the Final Plan. 28

The Situation Management Areas of the Greater Yellowstone Grizzly Bear Guidelines are outdated. The Shoshone National Forest Plan should design management practices with enough flexibility to accommodate shifting classification of lands as new data and grizzly use patterns develop. 29

We commend the Shoshone National Forest for recommending no oil and gas development in Situation 1 grizzly bear habitat. Such development would disrupt use of habitat by grizzlies and increase the chance of bear mortality from human-grizzly encounters. We urge the Forest to also withdraw those Situation 2 lands frequently used by bears. 30

The level of timber harvest, and the accompanying roads, on the Clarks Fork District of the Forest is of great concern to us. Seventy percent of the timber volume the Plan proposes to sell on the District in the next ten years is in Situation 1 grizzly bear habitat (personal consultation, Clarks Fork District Ranger). Approximately 25% of the volume is in Situation 2 habitat. While the District has adopted restrictions on the harvest, we feel they fall short of ensuring the recovery of the grizzly bear in Greater Yellowstone.

The network of new and upgraded roads to accommodate timber harvest in the Clarks Fork District will increase the human pressure on grizzlies in that area. Although some timber harvest may increase bear food production, removal of hiding cover will result in grizzlies avoiding some areas. Bear use will be disrupted during the actual harvest and afterward by increased hunting and recreational use on the new or upgraded roads. This increased risk is dramatized by the fact that hunter related incidents are by far the leading cause of grizzly mortalities on the Shoshone National Forest (DEIS p. III-43). Even if most roads are closed, experience has shown that closures are often breached. In addition, a backlash from a small, vocal element of the public can be expected when roads are closed due to grizzly use of an area. 31

Evaluated in conjunction with activities on the neighboring forests and park lands, the level of timber management in occupied grizzly habitat poses a high risk to the grizzly bear. The Final Plan should reduce the timber harvest and road construction in grizzly habitat, particularly on the Clarks Fork

Forest Service Response

182-28 The guidelines are currently being revised. As indicated in the Plan the guidelines as modified will be followed in coordinating projects in Grizzly Bear habitat.

182-29 See response to comments 44-30, 6-1, and 144-10.

182-30 No leasing is permitted in Situation I habitat except for NSO on a case-by-case basis along the exterior 1/2 mile. Situation II areas are protected by stipulations in the "Grizzly Guidelines". In developing the "Guidelines" it was determined that oil and gas activities could be conducted under various restrictions that would not "jeopardize" the continued existance of the bear.

182-31 See response to comment 158-7. Additional timber standards and guidelines for grizzly bear management situations have been added to Forest Direction in Chapter III of the Forest Plan. There also is a reduction of sales on the Clark's Fork Ranger District.

District. It is incumbent upon the Shoshone National Forest to demonstrate a compelling need for timber sales and road construction in occupied grizzly habitat.

Timber harvest in Situation 1 grizzly habitat should not occur during the spring when grizzlies are emerging from their dens. Presently, harvest is not allowed from April 1 until June 15. April 1 is average date of emergence for Greater Yellowstone's grizzlies. This means that half the grizzlies emerge before this date. Closure dates for timber harvest should be changed to the earliest date that grizzlies emerge from their dens. This will cause little conflict will timber harvest since March is a difficult time to log on the Shoshone National Forest. 31

While we recognize that limiting timber harvest in the months of October and November can create timber supply problems for logging operations, these months are also critical nutritional months for grizzly bears. Grizzlies rely on late season foods to carry them through the hibernation season to face the difficult food search in the spring. We oppose any relaxation of restrictions on timber harvest in the fall. The Shoshone National Forest has a legal mandate to provide for recovery of the grizzly bear. That recovery should not be compromised in Situation 1 grizzly habitat to allow for timber harvest in October and November.

Nowhere in the Draft Plan or EIS is the reader able to ascertain how many or where grazing allotments occur. For that reason, we offer only general suggestions regarding livestock grazing in occupied grizzly bear habitat. We encourage the Shoshone National Forest to pursue means of reducing livestock grazing in occupied grizzly habitat. Grazing of domestic livestock increases the risk of bear mortalities by increasing the chance of human-bear encounters. The Greater Yellowstone grizzly population cannot survive if these mortalities are not reduced. Allotments in Situation 1 habitat should be eliminated or transferred to areas not used by grizzly bears. Whenever possible, allotments in Situation 2 habitat should be changed from sheep allotments to steer allotments or transferred to areas not used by grizzly bears. 33

In sum, the Shoshone Draft Plan should reevaluate the proposed activities in occupied grizzly habitat. Activities which will disrupt bear use of an area or result in an increased risk of bear mortalities should be eliminated.

Other Wildlife

The Greater Yellowstone ecosystem's vast and varied species of wildlife are powerful attractions for tourists. Millions of people travel to the area and expect to see wildlife in the backcountry. Hunters rely on the excellent hunting opportunities for recreation and food. Non-game species abound in the ecosystem and contribute to its diversity, health, and appeal.

182-33 See response to comment 146-1. We agree that minimizing grizzly bear mortalities (particularly adult females) is a key to obtaining a recovered population. However, we have not had any conflicts in recent years revolving around grazing allotments in grizzly bear habitat. All grazing permits will include a clause providing for cancellation or temporary cessation of activities is such are needed to resolve a grizzly-human conflict situation.

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The Shoshone National Forest is home to a large share of these animals and contains some of the most important winter and summer habitat in the ecosystem. The wildlife resource on the Forest is an important part of the area's economy and provides many social and esthetic benefits. Wildlife, along with fisheries, recreation, and scenery, should be managed as the highest priority on the Forest. Resource development which competes with the wildlife resource should be allowed only if it can be shown that benefits of such development outweigh the costs and that the development does not degrade the wildlife, scenic, or recreation resources.

The Draft Plan assumes timber harvest will increase wildlife habitat diversity and proposes timber harvest to optimize habitat, particularly for elk (CHEC pp. 4-5). As mentioned in the "Timber" section of these comments, timber management on the Shoshone National Forest seldom benefits wildlife. Before timber management for wildlife enhancement is practiced in an area, the Shoshone National Forest must clearly demonstrate a need to enhance wildlife habitat and that a significant improvement will result from logging.

The Dunoir area is specifically cited as needing timber harvest to improve forage-cover ratios for elk and deer (DEIS p. III-34). The Shoshone National Forest should provide detailed documentation of that need before proceeding with vegetative manipulation. If the need for such management activity does exist, prescribed burns should be considered as an alternative to timber harvest and road construction.

Security and thermal cover is of great importance on the Shoshone National Forest and, in some areas, is the limiting wildlife factor. Timber harvest should be done in a fashion that will ensure adequate cover for wildlife. Old timber cuts should be allowed to return to cover before logging on adjacent lands is started. Thermal cover should be defined in the Plan as tree stands at least 30 to 60 acres in size, in sapling/pole stage or older, with canopy closures of 70% or greater. **34**

The standards for cover maintenance outlined in the Plan (pp. 48-49, 1.c) are not adequate to ensure elk use of non-forested areas. The percentage of forested areas in cover should be 80%, 85% and 90% respectively, for diversity units with 35-40%, 20-34%, and less than 20% forest cover (Wyoming Game and Fish Department comments on Shoshone National Forest Draft Land and Resource Management Plan). **35**

The suggestions for retaining adequate wildlife cover offered by the Wyoming Game and Fish Department should be incorporated into the Final Plan. Burnt Gulch, Wiggins Fork and Sawmill Creek, as well as numerous areas on the Clarks Fork District, are a few of the areas of specific concern.

The proposed harvest in the Clarks Fork, Meeteetse, and Trout Creek areas will substantially reduce security cover for **36**

Forest Service Response

182-34 See response to comment 41-13. See Standards and Guidelines, pages III-51 and III-52 of the Plan. Thermal cover on the Shoshone is also related to topography to ameliorate the effects of weather.

182-35 Many of the diversity units dominated by nonforested ecosystems have little if any of the forested areas that meet "cover" requirements and yet are still being used by elk. However, the standards and guidelines are minimum and projects in these areas will be coordinated with local Wyoming Game and Fish presonnel. In a 5000 acre diversity unit, the minimum acreages in hiding cover (if available) would represent 25 percent, 18 percent and 15 percent, respectively, using 50 percent, 30 percent and 20 percent forested. Using the suggested standard (it is not clear if these are intended as minimums) the acreages in hiding cover would be 40 percent, 25 percent and 18 percent, using the same example. The differences do not appear to be significant, but will be considered for projects in these areas. Very few of these areas have commercial timber on them in the Shoshone National Forest.

182-36 See response to comments 97-47 for Meeteetse, 97-70 for Trout Creek, and 97-37 for Clarks Fork.

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wildlife during the hunting season and leave little thermal and security cover for wildlife winter use. Increased roads will further disrupt wildlife use in these areas. Harvest should only occur when adjacent lands have been reforested. The recommendations of the Wyoming Game and Fish Department concerning these areas should be incorporated into the Final Plan. **36**

Roadless areas provide critical refuge for wildlife. Roads in these areas will harm wildlife. However, nearly all of the non-wilderness areas on the Forest are proposed for management which allows roads to be built. We strongly object to this management direction. Roadless lands slated for management prescriptions that allow roads should be changed to roadless management (Prescription 3B). **37**

Current research indicates that elk habitat effectiveness is reduced by 50% from a road density of two miles of road per square mile (CHEC, p. 6). Shoshone roaded lands currently have a road density of 2.1 miles of road per square mile, not including primitive roads (CHEC, p. 6). Therefore, elk in these areas of the Forest are being negatively affected by roads. Additional roads will cause further deterioration in elk habitat. The road density on roaded Forest lands should be reduced to an average of 1.2 miles per square mile and a maximum of 2.0 miles per square mile. These are standards recommended to maintain good elk habitat in roaded areas (Hoover and Wills, 1984. Managing forest for wildlife. Colorado Division of Wildlife). **38**

Critical preferred winter range on the Shoshone National Forest deserves special management. Winter range is the limiting factor for much of the wildlife on the Forest. It is imperative that winter range be managed in a way that ensures maximum use by wildlife.

Critical winter range should be withdrawn from oil and gas leasing and development. Timber harvest should only be done if it will increase winter forage for wildlife populations experiencing winter range shortages. Future transportation corridors should avoid these lands. Snow machines should be prohibited on, and within one-half mile of, winter range. The Forest should increase its enforcement of road and vehicle restrictions in winter range and pursue an aggressive policy of prosecuting violators. Specific recommendations from the Wyoming Game and Fish Department regarding restrictions of critical winter range should be incorporated into the Final Plan. **39**

The standards to maintain at least 80% of habitat needed to achieve population goals for indicator species and 90% of the habitat needed to achieve population goals of wildlife species commonly hunted, fished, or trapped (Plan, p. III-153, 2.a) are too low. The Plan should provide for 100% of the habitat needed to achieve population goals. **40**

Forest Service Response

182-37 To state that roads harm wildlife is an oversimplification. Certainly they can be very harmful to wildlife. Proposals to build roads into roadless areas are done in an interdisciplinary fashion to consider all resource management needs. The Forest Service mission is not only to protect wildlife but also to provide a mix of recreation opportunities and produce timber and quality water, etc. Only 80 miles of the 230 miles of new roads in the Plan will be open for public use. Because use of roads by the public is the greatest threat to wildlife, seasonal restrictions designed to protect wildlife are imposed even on those 80 miles which pass through wildlife sensitive areas. Scheduling of road construction, location of roads, and management of completed roads can be controlled such that wildlife is not harmed.

182-38 To access all timber in a continuously timbered area requires approximately 4 miles of road per square mile. The majority of these roads are local and are scheduled to be closed following timber harvest. Road management decisions and the decisions to build new roads are based on a consideration of all resources in an area, including wildlife needs and the targeted recreation opportunities being provided. The Forest Service is well aware of problems in road closure enforcement. See also response to comments 146-14. The standards for road densities contained in the forest standards and guidelines and in the individual management area prescriptions have remained unchanged.

182-39 See response to comments 97-30 and 97-76.

182-40 See response to comment 59-46. The intent of the Forest Plan is to try and meet the objectives established by the Wyoming Game and Fish Department. Where concurrence is not always agreed upon (as noted in the North Fork Shoshone Elk Unit) habitat management will be accomplished to the maximum extent practical with other resource consideration. See response to comment 97-26. We agree that riparian acreas are key areas for wildlife but consider sixty percent cover sufficient to maintina wildlife use. It should be noted that most Regional standards are minimums and not what the Forest objectives are on average.

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The DEIS indicates that all population targets, with the exception of the North Fork of the Shoshone elk herd, will be met by the proposed alternative (p. II-25). Only 63% of the North Fork elk herd target will be met. Since 92% of the North Fork elk herd target would be met by the reduced budget alternative (DEIS, p. II-26), we assume that proposed management practices, such as timber harvest, road construction, and livestock grazing, would result in reduced elk numbers in the North Fork. If this is the case, the Draft plan should be modified to eliminate those practices which adversely affect the North Fork elk herd. **41**

Research Natural Areas

The Shoshone National Forest contains some of the most botanically important areas in Wyoming (see Wyoming Natural Area Needs Workshop Proceedings, 1984). These areas contain a wide variety of plants and contribute to the ecological diversity of the Forest and the Greater Yellowstone ecosystem. We support "Research Natural Area" (RNA) designations for the five areas recommended in the DEIS (pp. IV-80-81). However, we feel there are further steps the Forest could take to ensure protection of unique botanical areas.

The acreage recommended for RNA designation in the Sawtooth Peatbed-Permafrost area should be expanded from 160 to 320. This will make the area more defensible as an RNA, in light of the grazing and off-road vehicle threats in the vicinity. **42**

The Cathedral Cliff area is presently slated for wood fiber production (Management Direction 7E) and semi-primitive, non-motorized recreation (Management Direction 3A). A timber sale is proposed for 1989 in the area (Plan, p. J-21). A wetlands complex in this area has been identified as the one of the most important botanical sites in Wyoming (Wyoming Natural Area Needs Workshop Proceedings,, 1984. E.I. Collins, ed., p. 80). The timber sale and management direction in the area will degrade the wetlands complex. The timber sale should be eliminated and the management direction for the Cathedral Cliff area changed to primitive recreation (Management Direction 3B). **43**

Many important botanical areas on the Forest do not meet the standards for RNA's. Because the Plan lacks a management area direction for special interest botanical areas that fail to meet RNA standards, areas like the wetlands complex in the vicinity of the Cathedral Cliffs are offered no special protection. The Final Plan should include a management area direction that affords protection to special botanical areas that do not meet RNA standards.

The Plan should include a "sensitive plant list." Such a list could be easily developed from the Wyoming Natural Area Needs Workshop Proceedings. This list would aid the effort to protect sensitive plants and preserve unique or sensitive areas. **45**

Forest Service Response

182-41 Population will not be reduced by 37 percent. The Forest only has capacity to provide 63 percent of Wyoming Game and Fish population objective on Shoshone National Forest given the percentage of the total population the Game and Fish assigned the Forest. The present population is at or exceeds Game and Fish objectives; however, a large percentage is on private land.

182-42 It was determined by the Forest Service Regional Ecologist and others that 160 acres would provide adequate protection. Grazing and ORV use will be prohibited. See prescription 10A in the Forest Plan.

182-43 See response to comments 87-1 and 14-9.

182-45 There are no federally classified threatened or endangered plant species on the Shoshone National Forst. Should any plant species be so classified in the future, appropriate protection measures will be implemented as required by the Endangered Species Act. The Forest has no proposed plants for the Sensitive Species List.

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Recreation

Recreation is the most valuable resource the Shoshone National Forest offers the public. According to the recently released Wyoming Futures Project (SRI International, 1985), tourism based on Wyoming's wildlife and natural beauty will continue to grow in economic importance. In order to help provide for this expected growth in recreation demand, preservation of the primitive and pristine recreational resources on the Shoshone National Forest should be the highest priority in the Final Plan. **46**

Recreation already plays a major role in the area economy. Outfitting alone provides over 500 seasonal jobs. In comparison, the timber program on the Forest directly provides about 54 jobs, at an annual cost of $3,000 per job (CHEC, p. 17).

Recreation values for roaded recreation are overestimated in the Plan (CHEC, p. 10-11). Roaded recreation capacities are 20 to 40 times the projected use (CHEC, p. 10-11). Therefore, new roads will produce no new recreation benefits. Use will merely be transferred from one part of the Forest to another. The Shoshone National Forest should not use recreation benefits as a justification for building new roads. The assumption that increased timber harvest and roads will benefit recreation should be removed from FORPLAN. **48** A prescription should be added which gives FORPLAN a choice other than providing high levels of timber harvest and recreation or minimal timber harvest and recreation (CHEC, pp. 11-12). This "custodial management" prescription would allow FORPLAN to select higher levels of recreation without increasing timber harvest. **49**

Recreation values for hunting and fishing were underestimated by Shoshone planners. The Plan uses values for resources based on the 1985 Resource Planning Act assessments. These values are low compared to values calculated by the Wyoming Game and Fish Department for hunting and fishing opportunities. We suggest the Final Plan use the higher values for wildlife resources. **50**

The DEIS suggests demand for wilderness recreation under the proposed alternative will decrease in the first planning decade and then begin to increase dramatically (p. II-36). While the decrease in the first decade is doubtful, there is little question that demand for primitive recreation on the Forest will increase substantially. This increased demand may occur faster than is forecasted as a result of many factors, such as paving the road over Dead Indian Hill. It is likely that demand for primitive recreation will eventually exceed supply on the Forest. It is imperative that nonwilderness, roadless areas on the Forest be kept roadless in order to be available to help meet this demand. **51**

The benefits and costs of developing roadless areas must be carefully considered. No roads should be built into roadless

Forest Service Response

182-46 Recreation and tourism include the more developed forms of recreation as well as the more primitive. In the alternatives presented in the DEIS, a balanced mix of opportunities was of high importance particularly in the preferred and noncommodity alternatives.

182-48 See response to comment 44-46.

182-49 See response to comment 44-1.

182-50 The RPA values used for recreation and hunting are based on a large number of studies done across the country and locally. These values are referred to as "willingness to pay" values. Such values are what recreationalists or hunters would be willing to pay for their recreation opportunity. Calculation of these values for hunting, for example, is based on but not equal to the amount a hunter spends. For example, studies on hunter expenditures include expenditures for food. In calculation of willingness to pay values, it is often assumed that the hunter would purchase and consume food even if he/she were not hunting. Thus this portion would not be included in willingness to pay values. This accounts, in part for the differences between the values included in analysis and those calculated by the Wyoming Game and Fish. A second, more technical reason, is that the base year for the dollars in the Wyoming Game and Fish studies was 1984 while the base year for dollars in the Plan is 1982. Thus there is a need to adjust these figures based on inflation so that they are in the same base (in short, comparing them as is would be a case of comparing apples and oranges).

Money returned to the economy including that portion of what hunters reported spending per day within local economies are also included in analysis. These monies are not included in economic efficiency analysis for they do not represent the willingness to pay value. However, they are included in economic impact analysis of all alternatives. In this way, both the total expenditures and impacts of these are included in analysis.

The values used in the Plan were based on values used for 1985 RPA update. In combining the various types of hunting as reported in RVD's required averaging. A 24 hour hunting day would be reported as two hunter RVD's by the Forest Service, therefore, the values shown on B-33 would be doubled and therefore more in line with the State's values.

areas unless it is clearly shown that benefits exceed costs, including the costs of degrading other resources and eliminating the primitive recreation opportunities in those areas. **51**

Grazing

The Draft Plan proposes an increase in available grazing capacity under all alternatives. The proposed alternative calls for an increase in available forage of 33% (DEIS, p. II-35). This increased forage should be allotted to wildlife or used to transfer domestic livestock out of areas which currently conflict with wildlife and recreational uses, such as occupied grizzly bear habitat. Increased forage should not be allotted to domestic livestock. **51a**

The Shoshone National Forest should pursue means of eliminating livestock grazing allotments in wilderness. Grazing degrades the primitive recreation and wildlife values of wilderness. Any opportunity to rid wildernesses of domestic livestock grazing should receive high priority. **52**

We applaud the Plan's suggestions for keeping livestock grazing from damaging riparian habitat and water quality. Problems now exist on the tributaries of the North Fork of the Shoshone, the East Fork of the Wind River, Bear Creek, Dunoir Creek, the Wood River, and on the Beartooth Plateau. The DEIS indicates an increased risk of degrading water quality and soils under the proposed alternative (pp. IV-37-38). No grazing should be allowed in riparian areas or areas with sensitive soils if such grazing will result in the degradation of the riparian habitat or water quality. Grazing that occurs in these areas should be closely monitored. **53**

The Plan indicates an increase in the demand for cattle allotments and a corresponding decrease in demand for sheep allotments (Summary, p. 43). While this may have desirable results, especially in occupied grizzly bear habitat, care must be taken to ensure that the change does not cause additional erosion, overgrazing, or water pollution.

Oil and Gas

Oil and gas leasing and drilling pose one of the biggest potential impacts on the Greater Yellowstone ecosystem. Oil and gas exploration is prevalent in all of the forests that lie within the ecosystem. The potential for oil and gas exploration and development to degrade the unique qualities of Greater Yellowstone is high enough that we request an ecosystem-wide, programmatic EIS on oil and gas leasing, testing, drilling and development be done jointly by the managing agencies in the ecosystem. **54**

182-51 See response to comment 44-46.

182-51A The Plan does not establish the allocation of forage increases which are expected to occur after the year 2000.

182-52 Grazing is specifically permitted in the relevant Wilderness Acts.

182-53 We agree that no grazing should be allowed in riparian or other areas where it would result in soil loss, habitat destruction or water quality degradation. Most such areas should be removed from the suitable range category and not computed into stocking levels for an allotment. It remains to provide a level and type of monitoring and/or a physical means for protecting these senstive areas. Please see Plan, Chapter III, under Wilderness Area Management, General Direction 19 to 28, Riparian Area Management and Management Prescription 9A.

182-54 Appendix K of the Plan describes a process we feel is adequate to protect subsystems within the greater Yellowstone area. We don't feel that, at current levels of leasing activity there is sufficient evidence to warrant such a broad EIS. We do feel that each agency should approach the leasing question similarly and communicate effects that may be cumulative.

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Forest Service Response

The Shoshone National Forest Plan is to be commended for recommending no oil and gas development in critical grizzly bear habitat. Such development poses a significant threat to the recovery of the grizzly. This withdrawal should be extended to Situation 2 grizzly bear habitat used frequently by bears. **55**

182-55 See response to 68-8.

We also applaud the restrictions proposed by the Shoshone National Forest on oil and gas development in other sensitive areas (Plan, Appendix E). However, it is difficult to ascertain where and when these restrictions will be used. We suggest that areas of low oil and gas potential and high wildlife and recreation values be withdrawn from leasing. Much of the Clarks Fork, Wind River, and Lander districts fall into this category. Areas that have a high risk of conflict between oil and gas development and amenity resources, such as the North and South forks of the Shoshone River, wildernesses, and special management areas, should be withdrawn from leasing. Critical winter game range and roadless areas should be withdrawn from leasing. Recommendations from the Wyoming Game and Fish Department regarding oil and gas restrictions in specific areas should be incorporated into the Final Plan. **56**

182-56 At present, the Forest Service is constrained from making lease recommendations based upon subsurface values. This is the authority of the BLM. The Forest Service charter is to recommend lease denial or appropriate regulatory stipulations based upon the capabilities or sensitivities of surface resources. We should note that high oil and gas potential areas coincide with land types (on the Greybull Ranger District) that are among the most erodable on the Forest. To concentrate leasing in these areas without regard to sensitivity of soil and water resources would be unacceptable.

The concept of grouping oil and gas leases for evaluation is also a positive step. We urge the Forest to continue to pursue those efforts and to extend the concept to other types of development.

VI-518

Other Minerals

Development of locatable minerals on the Forest should be subject to strict standards and restrictions which will ensure such development will not degrade other important resources. Water quality should not be degraded. Any project that will potentially hinder grizzly bear recovery efforts should not be allowed or should be modified to ensure the grizzly population will not be adversely affected. Mineral project plans should contain programs to monitor affects on wildlife, water quality, air quality, and scenery. Recommendations from the Wyoming Game and Fish Department regarding restrictions on mineral development should be incorporated into the Final Plan. **57**

182-57 It is the intent of the Forest Plan to restrict so far as possible (legal) any activities that could significantly affect grizzly recovery, water quality, wildlife, air quality and visual quality in any long term sense. A quantity of management direction is present in the Plan to facilitate this. Monitoring is a critical element in maintaining surface resource qualities and controlling disturbances at acceptable levels. Please see Chapter IV of the Plan, Monitoring and Implementation.

Clarks Fork River

The Clarks Fork River Canyon is a spectacular and unique resource. Wild rivers are disappearing across the nation. As that process continues, the value of the Clarks Fork increases. We support the management direction for the Clarks Fork River outlined in the Plan. The Shoshone National Forest should pursue any avenues available to ensure designation of the portion of the Clarks Fork River on the Forest as a wild and scenic river. **58**

182-58 The Proposed Plan incorrectly states that we can apply for an extension of the protection period for the River. It is contingent upon an act of Congress to protect the River either by including it in the Wild and Scenic River System or by providing additional temporary protection. It is uncertain at this point whether the Clarks Fork of the Yellowstone River will become a part of the National Wild and Scenic Rivers system. The Forest Service and the Administration are in favor of the River's inclusion. Management activities that are within the discretion of the Forest Service will be designed to maintain the River's eligibility. Other activities that are presently within the discretion of agencies such as BLM (minerals) or Federal Energy Regulatory Commission (hydropower development) could affect eligibility characteristics of the Clarks Fork. In the event such developments are proposed, we would recommend denial to the appropriate agency, until Congress acts. See also response to comment 97-1a.

Air Quality

Air quality on the Shoshone National Forest is currently very good. However, resource development, much of it off Forest lands, poses a long term threat to the Forest airshed. No degradation in air quality or increase in acid deposition on the Forest is acceptable. Protection from acid deposition and decreased air quality should be a high priority on the Forest. This will require coordination with other agencies and governing bodies, such as the program with the Bridger-Teton National Forest (DEIS, p. III-72). Air quality monitoring should be included in the Forest's monitoring plan.

59

182-59 We agree in general with this comment. Legally, nondegradation is applicable only to Class I airsheds (wilderness). As a practical matter, we need to protect resources elsewhere from the potential effects of acid deposition. Air monitoring is included, albeit not in detail, in Chapter IV of the Plan. Specifics of monitoring will be produced through a coordinated approach with other agencies and land managers that have an interest in dealing with this potentially disastrous impact.

Monitoring

The Draft Shoshone Forest Plan relies heavily on mitigation measures to ensure noncommodity resources are not degraded by development of commodity resources. For those mitigation measures to work, a detailed monitoring plan must be developed and implemented.

The monitoring plan outlined in the Shoshone Forest Plan (Chapter IV) is vague and leaves much unsaid. The monitoring plan should include a feedback mechanism that reduces, modifies, or eliminates development if impacts to fish, wildlife, recreation, or scenery are greater than anticipated. The Plan indicates that the monitoring program is contingent on the availability of funds (Summary, p. 66). If any part of the monitoring plan is not funded, activities that are no longer monitored should be halted until money is available.

60

182-60 As stated in Plan, Chapter IV, details of monitoring are included in documents incorporated by reference. Such documents are available for public review. Refer to response to comment 97-32a.

Summary

The Shoshone National Forest takes positive steps toward protection of the the Forest's valuable amenity resources. Restrictions on oil and gas development and timber harvest and protection of the Clarks Fork River are good attempts to solve conflicts between competing uses of the Forest. However, the Plan still contains weaknesses that endanger amenity resources and the health of the Greater Yellowstone ecosystem.

Recommended levels of road construction, timber harvest, and oil and gas development are too high in occupied grizzly bear habitat and areas critical to wildlife. The Plan calls for extensive mitigation measures to solve many of the conflicts between noncommodity resources and resource development. However, a vague and uncertain monitoring plan fails to inspire confidence that those mitigation measures will work--or even be implemented.

The Plan should be revised to resolve the problems we have outlined in these comments. Wildlife, scenery, and recreation should receive highest priority on the Forest. Competing

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resources should only be developed if they do not degrade these resources and are shown to have benefits which outweigh the costs. We urge the Shoshone National Forest to adopt this principle and make the necessary changes in the Plan.

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Greater Yellowstone Coalition

July 26, 1985

COPY

Mr. Tom Coston
Regional Forester
Northern Region
USDA Forest Service
Federal Building
Missoula, MT 59807

Dear Mr. Coston:

Thank you for this opportunity to comment on the Interagency Guidelines on Management of Grizzly Bears published in the Federal Register, May 28, 1985.

VI-521

The grizzly bear is an important component of the Greater Yellowstone ecosystem, both as a symbol of its wildness and as an indicator for the ecosystem's health. For this reason, while the Greater Yellowstone Coalition (GYC) supports the efforts of the agencies involved in the interagency effort to conserve the bear, we have some specific recommendations in regard to the proposed guidelines which we feel will help ensure the grizzly bear will become a recovered species in the Greater Yellowstone ecosystem as mandated by the Endangered Species Act.

1. GYC supports the adoption of the proposed Situation 2A language and areas with the following recommendations:

a. A program to gather the necessary data in order that 2A areas are stratified in a timely fashion should be developed.

b. The final designations of 2A areas should be subject to review by the IGBC.

2. GYC supports a change in the existing language used to define Situation 2 areas. Because there is evidence to show that grizzlies may be increasing their home range size in the Greater Yellowstone ecosystem for nutritional or reproductive reasons, some Situation 2 areas may need to be redesignated as Situation 1 areas. The language "considered unnecessary for survival and recovery of the species" should be changed to "which may be necessary for the survival and recovery of the species." The management direction should allow for grizzly use as the

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prevailing land use with other mutually exclusive land uses on a case-by-case basis. This will afford the agencies flexibility in managing Situation 2 areas which have the potential be redesignated as Situation 1 areas.

3. GYC feels that discouraging grizzly bear use in Situation 3 areas is a good idea. We oppose the discouragement of grizzly use in Situation 1, 2, 2A, 4, or 5 areas.

Sincerely,

Bob Anderson
Executive Director

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Forest Service Response

FPD-183-_P-_L-C
Proj. No. Orig Type Affil

September 28, 1985

Mr. Michael Iloyd
U. S. Forest Service
Meeteetse, Wy. 82433

Dear Mr. Iloyd;

I would like to express my views on the proposed road closures in the Meeteetse District of the Shoshone National Forest.

I do not think the Forest Service or Game & Fish has the right to close a road or area to the public without a vote. If you have a problem with the roads and people driving off them, then arrest the guilty parties. Once we lose the rights to travel on these roads, we will never get them back. The weather will determine when the roads will be open or closed. I have lived in the Meeteetse area for eighteen years and I have not noticed much of a change in the roads. 1

183-1 Transportation system management on National Forest lands is indeed a proper function of the Forest Service. Road closures are based on wildlife, scenic, soils, water, or other reasons, and will continue to be enforced.

We have very few places to go in the Winter & Spring, if we can't go to the mountains, then we may as well move to a city and sell our snow machines.

Now to the wildlife problems that I have heard about:
In most of the areas that are considered in the closure our elk winter off of the forest, unless there is a very mild winter. I do not think the snow-goers are going to hurt the elk one bit. They take tours thru the elk refuge in Jackson Hole & the elk don't mind it. However, if someone is harrassing the elk, then he or she should be arrested. 2

183-2 Studies have shown that elk can be displaced from Winter ranges by human activities. Elk at the Jackson Hole Refuge are accustomed to vehicles due to artificial feeding. Snowmobiling is not permitted at large on the Jackson Hole Refuge.

If we can't compromise a little, then we won't need a Forest Service or a Game & Fish, because, there won't be a need for them, if these areas are closed to the public.

I also think, the elk could stay on their range longer if the Forest Service would cut back on the A.U.M.S. of some of the permit holders. Some areas are really overgrazed.

The locked gates & locked cabins are a bad deal, since the permit holder can use the cabins & drive on the roads to get to their livestock & the general public can't.

In closing, if the Forest Service closes these areas to the public, there should be nobody allowed to travel in the areas during the road closure, not even the Forest Service or the Game & Fish as they would not have any reason to be in these areas, either. 3

183-3 Occasional administrative use may be necessary for censusing, population, and habitat management.

We are taxpayers!

Thank you,
John Deromedi
Box 152
Meeteetse, Wy. 82433

VI-523

Comment 184

FPD - 184 - F - L - C
Proj. No. Orig Type Affil

Lander , Wyoming
October 3 , 1985

Dear Sirs,
I am writing with regard to the Shoshone Forest Plan. Although an increase in the already troublesome grazing permits concerns me, the two issues which concern me the most are the heavy emphasis on timbering and the expansion/ and or reconstruction of roads.
As I understand it, the Forest Plan uses the price range of $39-59 per thousand board feet in their timbering calculations, although in recent years the average high bid for live timber in Shoshone National Forest was only $32 per thousand board feet. Consequently below cost sales result when yearly road costs are added in. This is not economically sound planning. 1
It has been inferred that recreation benefits by an increase in roads, but current capacity for recreation is already in excess of any future anticipated needs. The Draft Plan proposes a figure of between 3 and 4 miles of road per square mile to be built even though the recommended figure for optimum elk habitat be no more than 1.2 (Game and Fish recommendation). 2 3
With specific regard to clearcutting, aside from disrupting elk herds, I feel it would be particularly detrimental to non-game species, an integral part of the wilderness. 4
Areas of particular concern are the Union Pass sale of 363 acres, and the sales in the Atlantic Peak area (Upper Rock Creek and Rock Creek). 5
Thank you for allowing input from the public on this crucial plan. If past performance is any indicator the Shoshone National Forest will come to a decision truly in the best interest of the wilderness.

Thanks much,

Margaret Gordon

Maggie Gordon
185 Wood Street
Lander, Wyo. 82520

RECEIVED
Lander District
Shoshone National Forest
Lander, Wyoming
OCT 03 1985
NAME ACTION
RGR
TIMBER
RANGE
RECR
D.CLK

Forest Service Response

184-1 Timber sales selected through the forest planning process have been selected to maximize present net value. Data is based on historic selling value and experienced costs. It is anticipated that future sales will not be "below cost" sales according to present knowledge of selling values and costs. Wildlife and recreation values have not been included in the calculations of PNV for the purposes of selecting sales for harvest.

184-2 The planning process used did not assume that increased roading automatically benefited recreation. The relation of roads (existing and new) to recreation varies depending on the recreation opptunities being provided. Briefly, there are no roads allowed in Primitive areas, no open roads allowed in Semiprimitive Nonmotorized areas, only a certain density of roads allowed in Semiprimitive Motorized, and few restrictions on roads in Roaded Natural and Rural areas. Refer to EIS Chapter VII-Glossary under Recreation Opportunity Spectrum for for definitions. Prescriptions for individual areas were developed based on providing a targeted mix of recreation opportunities in that area. In or near that portion of an area targeted for primitive recreation, roads do not benefit, and in fact are a detriment, to recreation. In that portion of an area targeted for semiprimitive nonmotorized recreation roads will not benefit and may or may not be a detriment to recreation depending on location and road management. In areas targeted for motorized recreation, additional roads can benefit recreation. See response to comments 44-46 and 44-43.

184-3 To access all timber in a continuously timbered area requires approximately 4 miles of road per square mile. The majority of these roads are local and are scheduled to be closed following timber harvest. Road management decisions and the decisions to build new roads are based on a consideration of all resources in an area, including wildlife needs and the targeted recreation opportunities being provided. The Forest Service is well aware of problems in road closure enforcement. See also response to comments 146-14. The standards for road densities contained in the forest standards and guidelines and in the individual management area prescriptions have remained unchanged.

184-4 Timber harvest activities are not permitted in classified wilderness areas. See FEIS Table IV-16 for effects of vegetation manipulation on indicator species.

184-5 The Union Pass sale has not been included in the Final Forest Plan.

Comment 185

Forest Service Response

FPD-185-F-L-B
Proj. No. Orig Typo

The National Outdoor Leadership School

October 1, 1985

Steve Mealey, Forest Supervisor
Shoshone National Forest
Cody, WY 82414

Dear Steve:

Thank you for this opportunity to respond to the Proposed Land and Resource Management Plan for the Shoshone National Forest. Being a commercial permittee whose number one priority is the education of people in outdoor skills, leadership, and conservation, we feel we are in a unique position to comment on the Plan.

We appreciate the support you have given us over the past years, and hope that we can work closely in the future. NOLS understands the difficulty in balancing the many resources and demands on the forest and respect you and all of those who put so much effort into this Plan.

Sincerely,

Jim Ratz
Executive Director

lne

Jim Ratz
Executive Director

P.O. Box AA
Lander, Wyoming 82520
307-332-6973

NOLS

RECEIVED
Lander District
Shoshone National Forest
Lander, Wyoming
OCT 03 1985

NAME	ACTION
RGR	
TIMBER	
RANGE	
RECR	
D.CLK	
CLERK	

Thank you for your comment.

NOLS is a nonprofit educational corporation

Comment 185

FPD-185-F-4-B
Proj. No. Ltr. Type Area

NOLS RESPONSE TO THE DRAFT SHOSHONE NATIONAL FOREST PLAN

1) The National Outdoor Leadership School commends the Shoshone National Forest for the recommendation of the Wild and Scenic River status for the Clark's Fork River. We are pleased to see that the preservation of this beautiful and unique river is a high priority. 1

2) We are also pleased to see the emphasis placed on recreation and other non-commodities in the overall direction of the Forest. The Proposed Plan, however, does not go far enough in its support of these amenities. Recreation alone will generate over $400 million during the life of the plan and yet currently only about $400,000 (12.7% of the yearly budget) is spent on recreation and wilderness (pg.II-8 of the Plan). The Forest admits that not enough money has been budgeted for recreation both on page II-29 where it states "management intensities for dispersed, developed, and wilderness are at a low level, and in many cases below the level described in the Regional Acceptable Work Standards" and on page II-40: 2

> Field personnel and financing have not been available to manage the wilderness properly. As a result, management jobs such as contacting visitors, checking livestock grazing, maintaining trails, implementing wilderness plans and other tasks associated with wilderness administration have not been performed to the required standard.

NOLS would like to see more Forest Service money and personnel devoted to recreation on the Shoshone National Forest.

It is of interest that during discussion of the social and economic lifestyles of the various local communities a timber company such as LP in Dubois is specifically mentioned several times throughout the DEIS and the Plan as a very influential part of the area. Yet NOLS, an organization with a four million dollar annual budget that employs more people than LP and is the largest backpacking permittee on the Shoshone National Forest, receives no recognition. 3

3) We are disappointed to see the heavy emphasis placed on timber in the Proposed Plan. FORPLAN uses the price range of $39-59 per thousand board feet when determining the economic benefits of timber cutting. However between 1981 and 1985, the average high bid for live timber on the Shoshone National Forest was only $3Z. When including the yearly road costs in projected timber expenses, below-cost-sales result. The DEIS implies that there is an inherent benefit to recreation with increased roading, however table IV-4 shows that current recreation capacity, especially that which is motorized, greatly exceeds projected demand. The Game and Fish recommends that there be no more than 1.2 miles of road per square mile of land for optimimum elk habitat, yet under the Proposed Plan between three and four miles of road per square mile of land will be built. We doubt whether wildlife will really benefit from the proposed timber practices as is implied in the Plan. 4 5 6

Forest Service Response

185-1 The Proposed Plan incorrectly states that we can apply for an extension of the protection period for the River. It is contingent upon an act of Congress to protect the River either by including it in the Wild and Scenic River System or by providing additional temporary protection. It is uncertain at this point whether the Clarks Fork of the Yellowstone River will become a part of the National Wild and Scenic Rivers system. The Forest Service and the Administration are in favor of the River's inclusion. Management activities that are within the discretion of the Forest Service will be designed to maintain the River's eligibility. Other activities that are presently within the discretion of agencies such as BLM (minerals) or Federal Energy Regulatory Commission (hydropower development) could affect eligibility characteristics of the Clarks Fork. In the event such developments are proposed, we would recommend denial to the appropriate agency, until Congress acts. See also response to comment 97-1a.

185-2 See response to comment 44-55.

185-3 NOLS was not mentioned specifically, but was included as part of discussions regarding outfitters and guides as well as discussions of private firms providing recreation opportunities including lodges. The impact of NOLS was not left out of analysis. In fact, its impact is one of the reasons there is such a difference in ranking of the preferred alternative in terms of economic impact when comparing impacts in the north economic impact area versus the southern economic impact area. Its value to the local economy and in terms of providing a service to the public is recognized and influenced decisions.

185-4 Timber sales selected through the forest planning process have been selected to maximize present net value. Data is based on historic selling value and experienced costs. It is anticipated that future sales will not be "below cost" sales according to present knowledge of selling values and costs. Wildlife and recreation values have not been included in the calculations of PNV for the purposes of selecting sales for harvest.

185-5 See response to comments 33-4 and 182-5.

185-6 To access all timber in a continuously timbered area requires approximately 4 miles of road per square mile. The majority of these roads are local and are scheduled to be closed following timber harvest. Road management decisions and the decisions to build new roads are based on a consideration of all resources in an area, including wildlife needs and the targeted recreation opportunities being provided. The Forest Service is well aware of problems in road closure enforcement. See also response to comments 146-14. The standards for road densities contained in the forest standards and guidelines and in the individual management area prescriptions have remained unchanged.

Comment 185

FPD-185-F-L-B
Proj. No. Orig Tech Affil

There are many proposed timber sales that will directly affect recreationists, specifically NOLS and the areas we use. On the Clarks Fork Ranger District over 1700 acres near Reef Creek and Pilot Creek will be harvested by eight separate cuts over the next ten years. Of that acreage more than 1400 acres is directly in Situation I grizzly habitat and the rest in Situation II. We are concerned also by the Hardee sale in 1991 placed in Sunlight Basin again in Situation I grizzly habitat. On the Lander Ranger District the timber cuts in Upper Rock Creek (1987) and Rock Creek (1992) of 383 acres and the 184 acres scheduled to be cut during 1988 in Sawmill Creek will directly affect our courses enroute to the Atlantic Peak area. The Wild Horse cut near Pete's Lake trail will include major road building and therefore, increase pressure on the wilderness in that area. On the Wind River Ranger District the Union Pass sale of 363 acres is in an area that NOLS currently uses during all seasons to teach outdoor education. If the Proposed Plan is adopted, during the next ten years over 3500 acres of timber will be harvested and fifty miles of road will be constructed or reconstructed in country that we cherish.

7

8

9

4) Grazing is expected to increase 33% over present use during the planning period. There are many conflicts with the present and future levels of grazing. On page IV-36 of the DEIS it states:

> Grazing on allotments with high levels of recreation use will have conflicts. [and] The presence of livestock within a wilderness is considered by some to be inappropriate and detrimental to the wilderness experience, but this is unavoidable and will occur across all alternatives to varying degrees.

Soil and vegetation, water, and wildlife forage can all be affected negatively by livestock unless the latter is intensely managed.

> The time required to improve deteriorated (unsatisfactory) range conditions will depend on the level of authorized grazing use, the intensity of grazing management and the priority of funding for individual allotments.

We are concerned that range expenses are and will continue to be higher than revenue and therefore not enough money will be available for adequate monitoring and management. The range conditions above Grave Lake present an excellent example of very noticeable degradation. We agree with many that grazing is inappropriate in wilderness areas both environmentally and socially, and wish to see this use limited and eventually phased out. We strongly recommend that the Shoshone National Forest never consider converting current sheep grazing allotments to cattle allotments.

10

5) Even though oil and gas leasing is not directly integrated into the Plan we commend the Shoshone National Forest for the decision to not allow leasing in Situation I grizzly bear habitat. We are pleased that

Forest Service Response

185-7 It is recognized that disturbance activities such as timber sales can displace grizzly bears and potentially increase the risk of bear mortalities. Mitigation measures such as provisions for adjacent security areas and stringent controls on timing and administration of activities will be incorporated as necessary in timber sales. As indicated, logging can improve the quality and quantity of bear foods.

185-8 Between Draft and Final, some sales in the area mentioned were modified. Standards on timber harvest in the Plan are designed to enhance both visual quality and wildlife habitat. Further standards on roads built to support timber management call for those roads to be closed to public use. Until more site specific analysis is done regarding recreation access needs in these areas, any new roads built for timber will be closed.

185-9 The Union Pass sale has not been included in the Final Forest Plan.

185-10 Neither analysis area 194 nor analysis area 195 will be managed for domestic livestock. Should a conversion from sheep to cattle be proposed, only after an analysis concludes the range is suitable will a conversion be made.

Comment 185

FP D- 185 - F - L - B

an Environmental Assessment was required during the Wapiti lease application and wish to see this practice extended to ALL future lease applications throughout the Forest on a drainage specific basis. 12

6) NOLS prefers a mixture of Alternative C and E. There is no alternative that separates developed recreation from dispersed recreation and beyond that, motorized from non-motorized. The Forest Service rejects Alternative E partially because its opportunities for recreation are considered "primitive experiences of low quality" (II-26 of the DEIS). Yet quality does not necessarily increase with "trail maintenance and access". Conversely, we argue that quality most often decreases with trail maintenance and access. The problems created by "easy" access are evident on much of the Bridger-Teton National Forest. On that Forest access and "highway trails" have led to severe impact and, therefore, the necessity for special management restrictions. Comparatively, the Shoshone, with its limited access, maintains high quality resources and more opportunity for pristine and primitive experiences. Alternative E is the only one with reduced timber harvesting. Mining regulations are most strictly enforced in Alternative C and on page IV-45 of the DEIS it is stated that soil erosion due to increased timber harvest is least affected by both of these alternatives. Alternative C and E are the only ones that reduce grazing AUM's and therefore reduce the potential for conflicts between livestock and the other Forest resources. They both have the most non-motorized opportunities for recreation (pg. IV-8 of the DEIS) which is of utmost importance to both backpackers and horsepackers. Alternative C does have more money to spend on management and enforcement of recreation. A mixture of the two - an alternative stressing recreation and wildlife without the implication that timber and grazing must directly follow the same curve - is one which would economically and socially benefit the Forest over a long range period. 13

7) In the general management direction of dispersed recreation it is stated that party sizes and stock are governed by the Greater Yellowstone Area Outfitter-Guide Policy. In this policy a top limit is set of 20 backpackers in wilderness. Yet a group size of 20 people and 30 horses is allowed. Most often one horse creates much more impact than one human, however these group sizes are not managed accordingly. NOLS recommends that people should at least be treated equally to recreational stock and a group size of 20 people AND/OR stock be adopted. This would greatly reduce the environmental and social impact that can be caused by large recreational stock parties. At this time no group size limitations are set on non-wilderness lands. We recommend that there be some upper party limit of combined stock and people so that these lands do not become "sacrifice areas". 14

8) On page III-204 the general direction of the Plan is to permit only one special party per 2500 acres. Several special use permittees should be able to use the same 2500 acre area IF their uses do not conflict or create a "non-pristine" wilderness. We understand the definition of a pristine experience to be the sightings of less than two other parties per day. NOLS has proven over the past twenty years that by traveling off-trail and choosing discreet campsites two parties can be VERY close

Forest Service Response

185-12 We direct your attention to Plan, Appendix K which outlines the procedure we intend to follow with all future lease applications. The Wapiti lease group effort was guided by this appendix.

185-13 Experience in areas of high recreation use show that in the absence of management (controls on usage, maintenance of facilities) quality of recreation experience degrades significantly. Experiences in such high use areas as the Bridger-Teton and the Colorado Front Range show that limiting access does not do much to reduce use pressure. In addition, all alternatives, and particularly the preferred alternative, were designed to provide a particular mix of recreation opportunities based on analysis of past use and anticipated demand. Sometimes limiting access is not compatible with the recreation opportunity being offered. However, the problems created by increased access can be treated in ways other than access restrictions such as location of trails and trailheads, location and management of roads, information and education, law enforcement, and other controls as listed in Chapter III of the Plan (standards and guidelines). Refer also to response to comment 44-46.

NOLS preferred alternative C which reduces the opportunities for conflict between commodity uses and noncommodity uses partially by reducing commodity production levels. The Forest Service has attempted to keep conflicts to reasonable levels by limiting commodity uses in certain areas and by imposing standards and guidelines designed to reduce conflicts.

Whether or not the standards and guidelines are adequate and whether or not they are properly applied will determine Forest Service success in keeping conflicts within reasonable limits. See also response to comment 182-5.

185-14 Outfitters and guides are managed in accordance with the Greater Yellowstone Area Outfitter Policy. This document is dynamic in that it is revised biannually by all of the administrative units in the Greater Yellowstone Area with input from the respective State Game and Fish Departments and the Outfitter Associations. Through the provisions of that doucment the Forest Service exercises appropriate control over that industry with regard to wilderness and grizzly bear protection.

The Forest Direction for Wilderness Management (Management Activity B02 in the blue pages) gives conditions under which a permit system can be implemented.

The Shoshone recently completed an evaluation of various tools, including permit systems, for managing all recreation in grizzly country and opted for an information and facilities program rather than a permit system.

Party size and stock limits are set in the Greater Yellowstone Area Outfitter Policy. They are relatively consistent among the various administrative units in the area and are designed to allow the traditional uses that occurred before the area was designated as wilderness to continue. Ordinarily, use that approaches the upper limit of people and livestock is by commerical parties that are required to have a permit. Through permit requirements their presence can be adequately screened from the sights and sounds of other parties in the area thus reducing impacts.

Although there are no party size and stock limits in effect outside of wilderness on the Shoshone National Forest, there is no known use by parties in excess of the limits imposed in wilderness. If this becomes a problem, the restrictions could be extended to the area outside of

Comment 185

Forest Service Response

FPD-185-F-L-B

Proj. Id. [illegible]

and never know of the other's existence. The utilization of proper conservation practices can protect a pristine area both environmentally and socially much more effectively than a specific number of groups. — Education, not restriction, is the answer that the Forest Service should adopt. Rather than setting a limit of one permit, the Shoshone National Forest should take the responsibility of managing on a case-by-case basis, integrating uses when appropriate, and denying permits when the prisitine experience cannot be assured.

16

185-16 General direction by ROS class is designed to provide general guidance for management of a wide range of circumstances. There is within such direction, flexibility to adapt to requirements of special circumstances. The intent is to provide for a specific type of recreation experience. If that intent can be met in specific areas, then the need to strictly adhere to a guideline restricting the number of parties within an area can be waived. In the case of a special use permit such as the kind issued to the National Outdoor Leadership School, analysis of the applicability of such standards to specific cases will be done at the time the permit is issued with subsequent monitoring to assure that the desired recreation opportunity experience is being provided.

9) NOLS is very concerned with the monitoring section of the Plan. In section IV of the Plan, reevaluation will not occur until use exceeds capacity for a period of three years. Whenever impact becomes greater than the Forest plans it should be immediately examined and, if necessary, corrected. Allowing patterns of use to occur for three years could be irreversible both environmentally and socially. Traditionally enough money hasn't been budgeted for monitoring and enforcement of the management prescriptions. Evaluation must be implemented on a yearly, formal basis and then these findings direct the subsequent policies.

17

185-17 Implementation of the Plan will be monitored and evaluated on a annual basis by the interdisciplinary team. In specific cases where environmental degredation is occuring, the significance of the degredation will be determined. Based on this determination, immediate actions to remedy the situation can be implemented based on an amendment to the Plan.

10) One of the largest obstacles in managing recreation is the lack of education among users. Very rarely do we read in the DEIS or the Proposed Plan direct mention of the importance of education as a tool before or alongside restriction when protecting the Forest resources. An increase in all forms of education including visual and written information, backcountry visits, and school programs is important. On pages III-36 to III-46 of the Plan, the Forest Service mentions specific conservation and educational techniques. We would like to see this also included in the general management direction of dispersed recreation on pages III-33 to III-35. In both areas of management direction we encourage more thorough, specific, written treatment of education and the enforcement of conservation pratices. Overall, we are very grateful of the support that the Shoshone National Forest has given NOLS and our educational program over the years. The Forest could further utilize an organization such as NOLS on a more frequent and continual basis to help train its own wilderness rangers and managers in conservation techniques. Together the public and private sector can and should work more closely to manage and preserve the wilderness and non-wilderness Forest lands.

18

185-18 We agree that education of users would go a long way toward reducing degradation of wilderness and even nonwilderness dispersed areas. Management activities have in the past, and will continue, to emphasize information and education programs that teach wildland ethic and low impact camping techniques to users of the back country.

We have added a statement to both the dispersed area and wilderness area management direction for the Forest indicating that increased levels of use may be allowed when a high degree of user education is evident. We have also added a statement to both areas directing that the public and private sectors work together to preserve wildland values.

LIST OF AGENCIES, ORGANIZATIONS, BUSINESSES, AND INDIVIDUALS TO WHOM COPIES OF THIS STATEMENT ARE SENT

BUSINESS

Absaroka Ranch
Robert Betts, Jr., Owner
Dubois, WY

Amerada Hess Corporation
Chris R. Dimond, Landman
Denver, CO

American Mining Congress
Keith Knoblock
Washington, DC

American Mining Congress
Thomas Nelson
Assistant to the President
Washington, DC

Aminoil, Inc.
Englewood, CO

Amoco Production Company
Denver Region
Roberta Anderson
Public Lands Coordinator
Denver, CO

Amoco Production Company
Robert Martin
Casper, WY

Amoco Production Company
V.J. Sheppard
Powell, WY

Anderson, Richard
Cody, WY

ARCO Oil and Gas Company
Rocky Mountain District
Dean Moses, Public Lands Coord.
Denver, CO

Areo Exploration
Claire Mosely
Denver, CO

Arizona Daily Star
Ray Ring
Tucson, AZ

BUSINESS

Atlantic Richfield Company
Dallas, TX

B-4 Ranch
Doug Hart
Redlodge, MT

Banner Associates Inc.
Henry Sostrom
Laramie, WY

Bear Creek Hunting Camp
Francis, Fox
Crowheart, WY

Billings Gazette
Tom Howard
Cody, WY

Bishop Associates
Ray Alavarado
Denver, CO

Bitterroot Ranch
Bayard Fox
Dubois, WY

Brent Mining Company
Graham Curtis
Lakewood, CO

Casper Star Tribune
Buzzy Hassrick
Cody, WY

Celsius Energy Company
David Anderson, Attorney
Salt Lake City, UT

Champlin Petroleum Company
James Taylor, Staff Landman
Englewood, CO

Chevron U.S.A., Inc.
Northern Region
Richard Hughes, Staff Analyst
Denver, CO

The Cody Enterprise
Cody, WY

BUSINESS

Cody Lumber
Mike Hanson, President
Cody, WY

Conoco Inc.
Fred Birdsall
Denver, CO

Conoco Inc.
Mark Mosley, Division Manager
Capser, WY

The Denver Post
City Desk
Denver, CO

Diamond D Ranch
Reg S. Phillips
Dubois, WY

Dubois Frontier
Dubois, WY

Elk Creek Ranch
Hap Ridgway
Cody, WY

Exxon Company USA
Exxon Public Affairs
Denver, CO

Forest Planning
Eugene, OR

The Gem Shop, Inc.
Eugene Mueller, President
Cedarburg, WI

Grizzly Ranch
Rick & Candice Felts
Cody, WY

Gulf Oil Corporation
Stan Cadwell
Casper, WY

Hancock Ranch
John Winsor
Boulder, CO

BUSINESS

High Country News
Carol Jones
Dubois, WY

Independent Record
Thermopolis, WY

Intermountain Forestry Services
James Riley, Executive Director
Ogden, UT

Ishawooa Construction Company
J. Nichols Patrick
Cody, WY

Jackson Hole Daily
Jackson, WY

Jackson Hole News
George Gladney
Jackson, WY

Julien Construction Company
H. W. Julien
Cody, WY

Kerr-McGee Corporation
Jim Spaulding
Casper, WY

KLZY Radio
Gary Palay
Powell, WY

Louisiana-Pacific Corporation
R. L. Baker, Chief Forester
Dubois, WY

Marathon Oil Company
E.M. Grant
Casper, WY

Marathon Oil Company
Bradley Penn, Land Coordinator
Casper, WY

Marathon Oil Company
H.E. Ramich, Regulatory Coordinator
Cody, WY

BUSINESS

Marquette Minerals
Sue Fulton
Lakewood, CO

May Petroleum Company
Pat Ketter
Denver, CO

Meridian Land & Mineral Company
Northwest Center
C.L. Matchett
Billings, MT

The National Outdoor Leadership School
Molly Hampton
Lander, WY

The National Outdoor Leadership School
Jim Ratz, Executive Director
Lander, WY

Northern Wyoming Daily News
Worland, WY

Osborne, James, Jr.
Lander, WY

Other Times
Park Ridge, IL

Parker Land & Cattle Company
Dubois, WY

Petroleum Association of Wyoming
Wendy Frueauf, Assoc. Director
Casper, WY

Phillips Oil Company
John Himebaugh
Denver, CO

Phillips Petroleum Company
Western Division
H. Love, Jr., Land Manager
Denver, CO

Phillips Petroleum Company
Mary Lee Fleischer
Denver, CO

BUSINESS

Phillips Petroleum Company
Carl Mullendore
Denver, CO

Phillips Petroleum Company
Dick Scharft
Denver, CO

The Powell Tribune
Powell, WY

The Riverton Ranger
Riverton, WY

The Rocky Mountain News
Denver, CO

Rocky Mountain Oil & Gas Assoc.
Alice Frell, Public Lands Dir.
Denver, CO

Rocky Mountain Oil & Gas Association
Jack Swenson
Denver, CO

Rural Electrification Administration
Environmental & Energy Requirements Div.
Joe Binder, Director
Washington, DC

Sargent Ranch
Sandy Sargent
Corwin Springs, MT

Seven D Ranch
Marshall Dominick
Cody, WY

Shoshoni Pioneer
Shoshoni, WY

Snyder Oil Company
John Amen, Vice-President/Land
Denver, CO

Sohio Petroleum Company
Rocky Mountain Division
Martha K. Sippel, Operations Geologist
Denver, CO

BUSINESS

Spence, Moriarty and Schuster
Chuck Herro
Jackson, WY

Texaco
G. M. Barrow
Denver, CO

Texas Oil & Gas Corporation
James Sherrard
Dallas, TX

Thorofare Outfitting
Don Schmalz
Cody, WY

True Oil Company
Robert Byron, Chairman IPAA
Public Lands Committee
Casper, WY

Union Oil Company of California
Chris Joseph
Los Angeles, CA

Union Oil Co. of California Land Dept.
Wayne Strong
Casper, WY

Valley Ranch
Dr. Oakleigh Thorne, II
President
Cody, WY

Western Engineers - Architects, Inc.
Duke Fehringer
Casper, WY

Western Forest Industries Assoc.
Scott Horngren
Timber Supply Specialist
Portland, OR

The Western Wilderness of Gary Keimig
Gary Keimig
Dubois, WY

D.M. Wilson Lumber Co.
Dubois, WY

BUSINESS

Winants Ranch
Rick McNeil, Manager
Cody, WY

Wyoming State Journal
Lander, WY

Wyoming Wood Products, Inc.
Patrick Hickerson
Lander, WY

ZK Outfitters
Gary Rice
Dubois, WY

INDIVIDUAL

Allen, Jim
Lander, WY

Allen, Rick
Lander, WY

Autrey, Robert
Boulder, Co

Bader, Michael
Yellowstone Park, WY

Baker, Bob
Dubois, WY

Bales, Art & Shirley
Cody, WY

Ball, Gene
Yellowstone Park, WY

Ballard, Mr. & Mrs. Fred
Dubois, WY

Bell, Tom
Lander, WY

Bennett, Byron
Meeteetse, WY

Bennett, Clark
Meeteetse, WY

Benson, Scott
Dubois, WY

Berry, Michael
Cheyenne, WY

Betts, Robert
Dubois, WY

Black, Jiggs
Riverton, WY

Bopp, Leonard
Meeteetse, WY

Bove, Clifford
Glen Cove, NY

INDIVIDUAL
Bowen, Jim Cody, WY
Braden, Byron Bothell, WA
Bryant, Steve Boulder, CO
Bryson, Andrew Laramie, WY
Bucknam, Virginia Dubois, WY
Burgener, Donald Powell, WY
Carlman, Leonard Jackson, WY
Catterton, Mike Cody, WY
Chadwick, Lynne Cody, WY
Cheeney, Larry Lander, WY
Clark, Celia Kaycee, WY
Cochrane, Hazel Belfry, MT
Cole, R.E. Cody, WY
Collins, Harvey Cody, WY
Compton, Glenn Cody, WY
Cornier, Mike Cody, WY
Cottle, William Cody, WY

INDIVIDUAL
Denton, Jeff Worland, WY
Deromedi, John Meeteetse, WY
Dieterich, Sally Laramie, WY
Dixon, Merle Denver, CO
Dominick, Lee Cody, WY
Dominick, Marshall Cody, WY
Duemler, Paul Ann Arbor, MI
Egan, Barb Newport, WA
Estes, Dan & Carole Cody, WY
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